INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

MONROVIA TOWNEPLACE SUITES PROJECT

CITY OF MONROVIA

Submitted to:

City of Monrovia
Community Development Department
415 South Ivy Avenue
Monrovia, California 91016

Prepared by:

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(949) 553-0666

Project No. THA1601

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1.0 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the Monrovia TownePlace Suites Project (proposed Project) at 102-140 West Huntington Drive in the southwest quadrant of the intersection of West Huntington Drive and South Myrtle Avenue in the City of Monrovia.

This IS/MND has been prepared pursuant to the California Environmental Quality Act (CEQA), as amended (*Public Resources Code* [PRC] §21000 et seq.) and in accordance with the *State CEQA Guidelines* (*California Code of Regulations* [CCR] §15000 et seq.). Consistent with *State CEQA Guidelines* Section 15071, this IS/MND includes a description of the proposed Project, an evaluation of the potential environmental impacts associated with implementation of the proposed Project, and findings from the environmental analysis.

Pursuant to Section 15367 of the *State CEQA Guidelines*, the City of Monrovia (City) is the Lead Agency for the Project. The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment. The City, as the Lead Agency, has the authority for Project approval and adoption or certification of the accompanying environmental documentation.

1.2 SUMMARY OF FINDINGS

Based on the environmental checklist form prepared for the Project (Chapter 4.0) and supporting environmental analysis (Chapter 5.0), the proposed Project would have no impact or less than significant impacts in the following environmental areas: agriculture and forest land resources, air quality, greenhouse gases, hydrology and water quality, land use, mineral resources, public services, recreation, traffic, and utilities and services. The proposed Project has the potential to have significant impacts on the following topics unless the recommended mitigation measures described herein are incorporated into the Project: aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources.

According to the *State CEQA Guidelines*, it is appropriate to prepare a Mitigated Negative Declaration (MND) for the proposed Project because, after incorporation of the recommended mitigation measures, potentially significant environmental impacts would be eliminated or reduced to a level considered less than significant.

1.2.1 Proposed General Plan Amendment Analysis

This IS/MND will serve as a Project/Program IS/MND. A project-level analysis is appropriate for specific development projects in which information is available for all phases of the project, including planning, construction, and operation. This IS/MND will provide project-level analysis for

all aspects of the Project except the proposed General Plan Amendment (GPA) and Land Use Element (LUE) revisions.

A programmatic analysis is appropriate for a series of actions that can be characterized as one large project and that are related either geographically, as logical parts in the chain of contemplated actions; in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. Because the proposed GPA and LUE revisions would allow for the increased development potential on parcels outside the boundaries of the Project site and because specific development proposals are not proposed on those parcels at this time, the proposed GPA and LUE revisions (as contemplated in the City's General Plan LUE) may be considered a logical part of the chain of anticipated actions required for development and implementation of the proposed Project. When additional details and construction plans are available for parcels affected by the proposed GPA and LUE revisions, the City will examine those actions to determine whether the effects were fully analyzed in this IS/MND or whether any subsequent additional environmental review would be required.

1.3 ORGANIZATION OF THE INITIAL STUDY

The IS/MND is organized into sections, as described below.

- **Chapter 1.0: Introduction.** This section provides an introduction and overview of the conclusions in the IS/MND.

- **Chapter 2.0: Environmental Setting and Project Description.** This section provides a brief description of the Project location, relevant background information, and a description of the existing conditions of the Project site and vicinity. This section also provides a description of the proposed Project and necessary discretionary approvals.

- **Chapter 3.0: Environmental Factors Potentially Affected.** This section provides a list of the environmental factors that would be potentially affected by this Project and a determination by the City as to the appropriate environmental document.

- **Chapter 4.0: Environmental Checklist and Discussion of Environmental Checklist Questions.** This section contains an analysis of environmental impacts identified in the environmental checklist and identifies mitigation measures that have been recommended to eliminate any potentially significant effects or to reduce them to a level considered less than significant.

- **Chapter 5.0: Mitigation Monitoring and Reporting Program.** Consistent with the requirements of PRC Section 21081.6, a mitigation monitoring and reporting program has been prepared for the proposed Project. The program describes the requirements and procedures to be followed by the City to ensure that all mitigation measures adopted as part of the proposed Project would be carried out as described in this Initial Study/Mitigated Negative Declaration (IS/MND).

- **Chapter 6.0: References.** This section identifies the references used to prepare the IS/MND.

1.4 CONTACT PERSON

Any questions or comments regarding the preparation of this IS/MND, its assumptions, or its conclusions should be referred to the following:

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2.0 ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 PROJECT SITE AND SITE DESCRIPTION

2.1.1 Regional Setting

The Project site is in the City of Monrovia (City), which is in the foothills of the San Gabriel Mountains in the San Gabriel Valley of Los Angeles County. The City is comprised of approximately 14 square miles. The City is bordered by the Angeles National Forest to the north and a number of other small cities, including Arcadia to the west, Bradbury and Duarte to the east, and to the south by a community known as Mayflower Village within the unincorporated area of Los Angeles County.

As shown on Figure 2.1, Project Location, regional access to the City and the Project site is provided by Interstate 210 (I-210), which bisects the southern portion of the City in an east-west fashion.

2.1.2 Surrounding Land Uses

The Project site is bound by Huntington Drive and office uses to the north; South Myrtle Avenue and office uses to the east; an alleyway, residential, and industrial uses to the south; and South Primrose Avenue and an equipment rental use to the west. Existing surrounding land uses are shown on Figure 2.2, Surrounding Land Use Map.

2.1.3 Existing Site Conditions and Land Use Designations

As shown on Figure 2.3, Assessor's Parcel Numbers, the Project site consists of a vacant dirt lot that consists of six parcels (Assessor's Parcel Numbers [APNs] 8508-010-901, 8508-010-902, 8508-010-903, 8508-010-904, 8508-010-905, and 8508-010-906). In total, the Project site is 1.71 acres.

As shown on Figure 2.4, Crossroads District, the Project site is located in the Crossroads District of the City's South Myrtle Corridor Land Use Plan. The Crossroads District is bounded by Maple Avenue on the north, Cypress Avenue on the south, Primrose Avenue on the west, and Ivy Avenue on the east. The Crossroads District is easily accessible from I-210 and is the location where Old Town connects to the high-tech corridor located on East Huntington Drive. In its existing condition, the Project site is designated Business Enterprise (BE) in the City's General Plan. The Project site also has a zoning designation of BE. The BE land use designation and zoning classification both allow for retail, office, research and development, and light industrial uses, provided that they do not cause a nuisance to neighboring sites and that they are performed within an enclosed building that meets high quality building design, site layout, and landscape standards.

The Project site is rectangular in shape and is relatively flat. The site is characterized by an undeveloped dirt lot. An aerial photograph of the Project site is shown on Figure 2.5, Existing Project Site, and details of the existing Project site are shown in Figure 2.6, Photographs of Existing Project Site.

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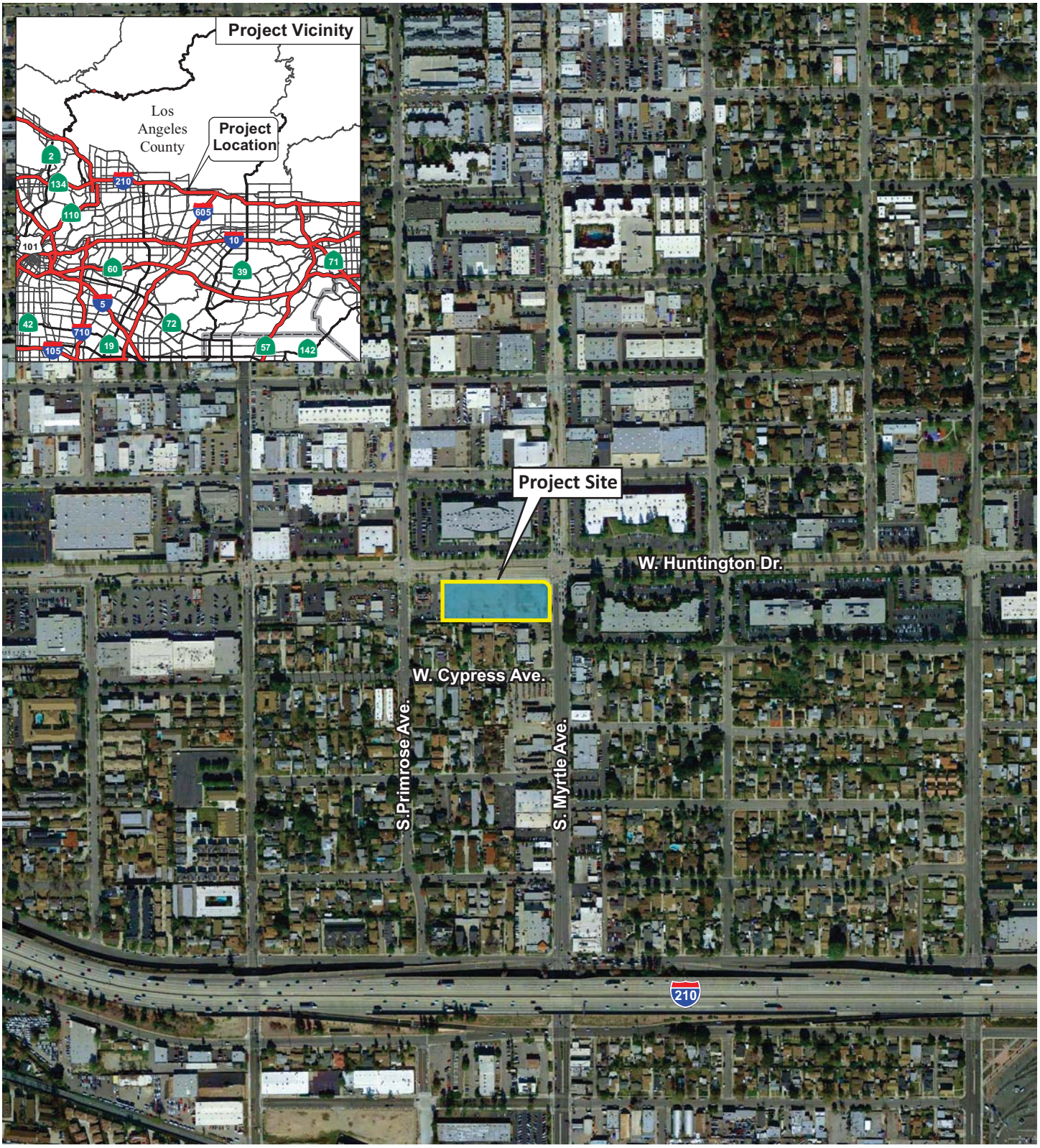

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FIGURE 2.1

LEGEND

Project Site

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0 375 750

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SOURCE: Google Earth, 2016

TownePlace Suites Project

Project Location

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LEGEND

- Project Location
- Area Proposed for Hotel Development
- Vacant

General Plan Land Use

- Single Family Residential
- Multi-Family Residential
- Commercial and Services
- Facilities
- Industrial
- Mixed Commercial and Industrial
- Mixed Residential and Commercial

0 250 500
FEET

FIGURE 2.2

TownePlace Suites Project

Surrounding Land Uses

SOURCE: Bing Maps (2014); SCAG (2012)

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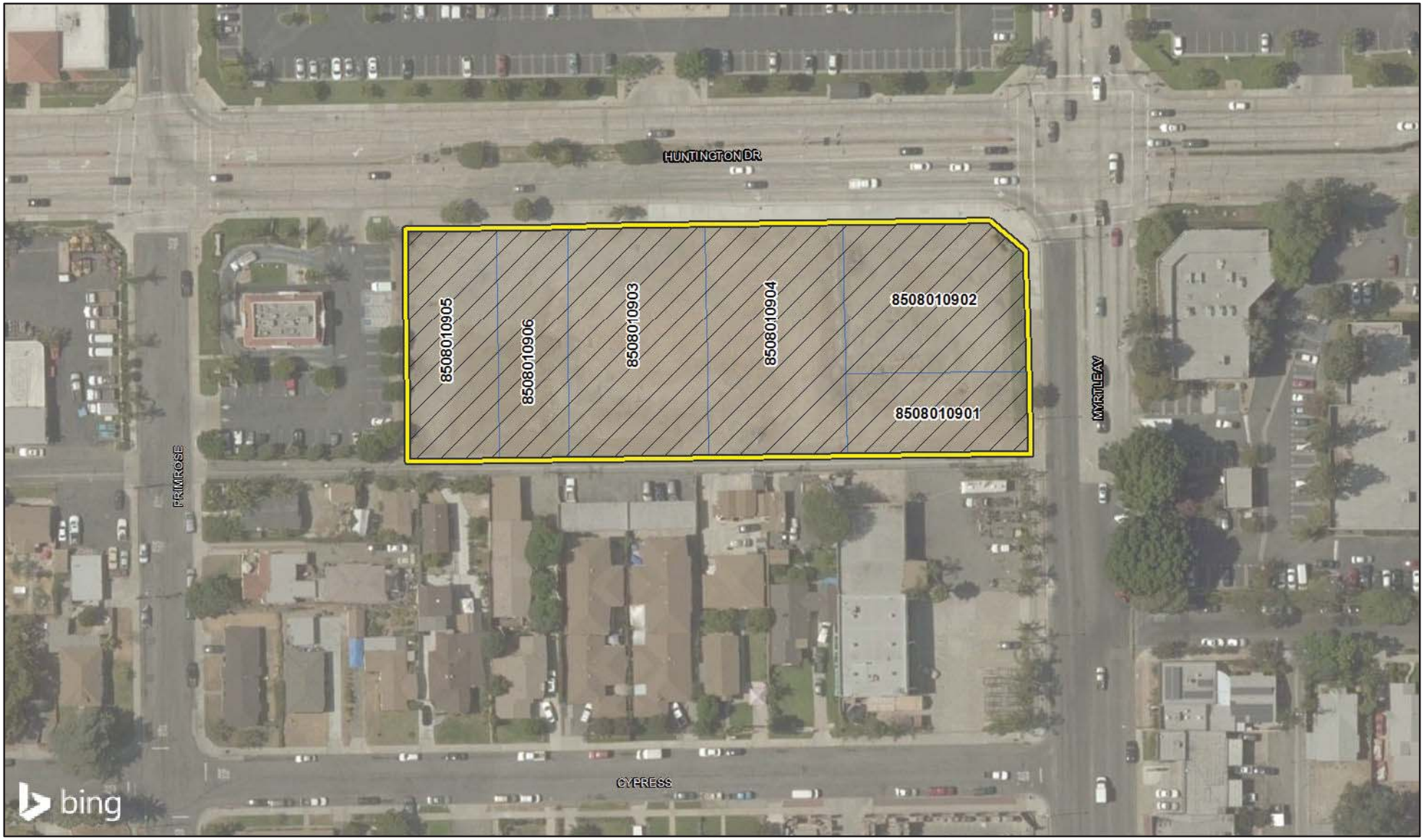

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FIGURE 2.3

LEGEND

Project Location

Area Proposed for Hotel Development

Project Parcels

N

0 50 100

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SOURCE: Google Maps (2016)

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TownePlace Suites Project

Assessor's Parcel Numbers

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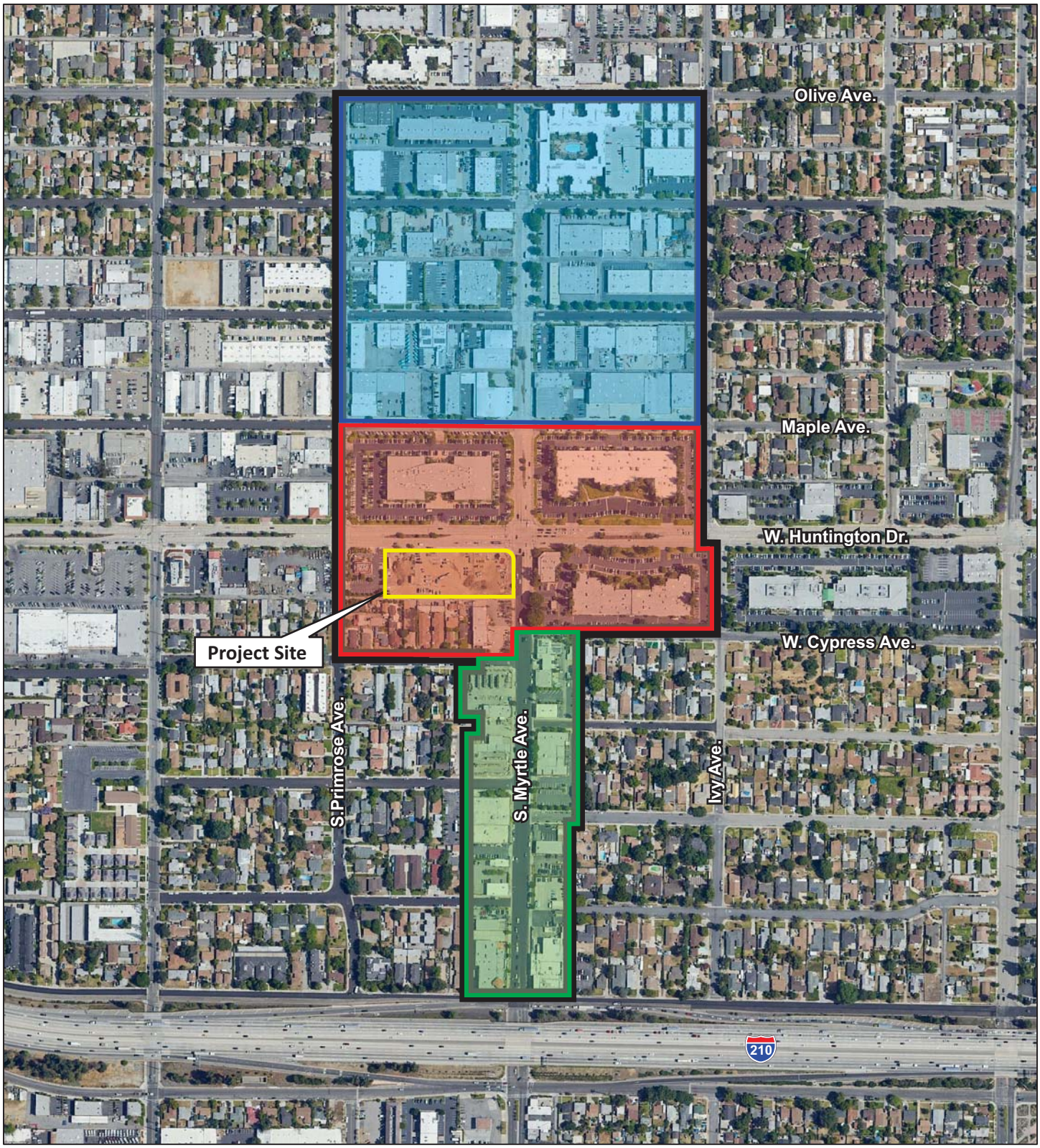

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South Myrtle Avenue Corridor

Planning Areas

Old Town Extension District

Crossroads District

South Myrtle Avenue District

N

0 250 500

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SOURCE: Google Earth, City of Monrovia

FIGURE 2.4

TownePlace Suites Project

South Myrtle Avenue Corridor Planning Area

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LEGEND

Project Site

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FEET

SOURCE: Google Earth, 2016

FIGURE 2.5

TownePlace Suites Project

Existing Project Site

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View of and from the Project site facing west.

View of and from the Project site facing northeast.

View of temporary Christmas tree farm on the Project site.

View of Project site facing south from Huntington Drive.

LSA

FIGURE 2.6

TownePlace Suites Project

Photographs of Existing Project Site

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In the existing condition, vehicular access to the Project site is provided via an ingress/egress point off of Huntington Drive and an ingress/egress point off of South Myrtle Avenue. An approximately 15-foot (ft.) wide sidewalk and intermittent ornamental trees form the northern boundary of the Project site along Huntington Drive, a 10 ft. wide sidewalk forms the eastern boundary of the site along South Myrtle Avenue, and an alleyway forms the southern boundary of the site.

2.2 PROJECT SITE HISTORY

Development on the Project site dates back to 1928, when the eastern portion of the property was developed with a gasoline station at the corner of West Huntington Drive and South Myrtle Avenue and a small residential structure on the western portion of the property. Uses on the Project site continued to consist of gasoline service stations and automobile-related commercial uses over the next 73 years; however, the residential structure dating back to 1928 was demolished in 1977. By 2002, gasoline service stations and commercial uses on the site were vacated and demolished. The Project site has remained undeveloped, vacant, graded land since 2002.

2.3 PROPOSED PROJECT

2.3.1 Development Proposal

The proposed Project includes the development of a five-story (65 ft.), 109-room TownePlace Suites Hotel by Marriot. The proposed hotel building would be in the northeastern corner of the site near the corner of West Huntington Drive and South Myrtle Avenue. The total building footprint coverage is estimated to be 14,000 square feet (sf) (19.0 percent of the Project site) with a total building area of 68,000 sf. Hotel amenities, including an outdoor swimming pool and an outdoor seating area, would be located near the northern boundary of the Project site. The conceptual site plan is shown on Figure 2.7, Site Plan.

The Project proposes a mix of three major room types consisting of one-bedroom, double-queen, and king studios. The first floor would consist of the main lobby, an exercise room, the breakfast room and an associated food preparation area, a community table and hub area, a mechanical and engineering area, a laundry room, offices, and several guest bedrooms. The remaining four floors would be composed of a mixture of the three room types.

The Project would include an on-site surface parking lot that would serve the guests, visitors, and employees at the TownePlace Suites. The on-site parking lot would provide 109 spaces. A small area proposed for trash collection and a loading area would be located within the on-site parking lot along the southern boundary of the Project site.

The trash enclosure would be approximately 14 ft. deep and 24 ft. wide, with a 12-inch concrete pad in front to allow convenient pickup and disposal. The trash enclosure would be enclosed with an 8 ft. high split-face concrete masonry unit (CMU) wall with a wall cap, two pairs of double-swing gates with non-transparent metal backing painted in dark bronze, and an approximately 3 ft. metal door. The CMU wall and wall cap would be painted to match the exterior of the proposed hotel building.

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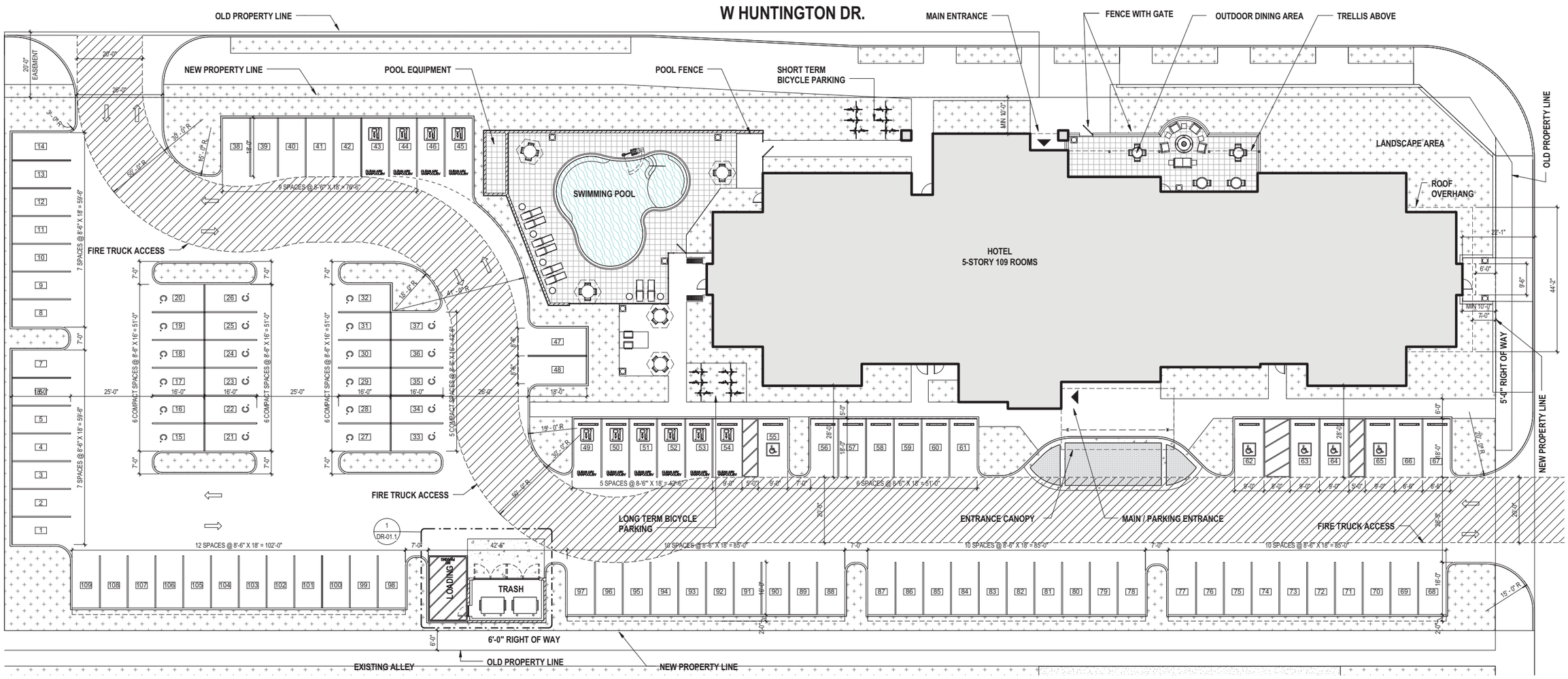

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FIGURE 2.7

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SOURCE: Design-Cell Architecture

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TownePlace Suites Project

Site Plan

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The proposed Project would also incorporate three dedications for public streets. The first dedication would include 5 ft. along the northerly section of the South Myrtle Avenue street frontage. This would provide enough land to allow for a 42 ft. half-right-of-way for South Myrtle Avenue. The second dedication would include 20 ft. along the westerly section of the Huntington Drive street frontage. This would provide enough land to allow for a 50 ft. half-right of-way for South Myrtle Avenue. In addition, the proposed Project would also be required to dedicate 6 ft. of property along the southern boundary of the site. This dedication would provide for a 16 ft. wide alley right-of-way along the southern boundary of the Project site.

2.3.2 Building and Site Design

2.3.2.1 Building Design

The proposed hotel would be designed in a modern architectural style and would be constructed with large windows, varying building façades and materials, and varying roof lines that would serve to increase the overall visual interest. The proposed hotel would feature a modern color palette and materials that create interest and highlight the varied building façade. Building materials on the ground floor would be stone veneer, and painted. Exterior Insulation and Finish System (EIFS), would be utilized for the upper floors of the building. The hotel would also include a metal roof, fiber cement siding panels on the building façade, and aluminum mechanical grills around the windows.

At its zenith, the proposed building would be 65 ft. in height, which includes a 10.5 ft. height increase from the building's second parapet to the top of the proposed roofline. As illustrated by Figures 2.8.a and 2.8.b, Building Elevations, the proposed roofline would be angular in some areas on the north and south elevations, but would be uniformly horizontal on the east and west elevations.

As illustrated by Figure 2.7, Site Plan, the proposed building would be set back 10 ft. from the edge of the roadway right-of-way and 10 ft. from the edge of the back of the sidewalk along West Huntington Drive and South Myrtle Avenue. The on-site parking lot would provide an additional buffer between the proposed building and the commercial property on the western portion of the property and the alleyway bordering the southern boundary of the site.

2.3.2.2 Parking

Based on the City of Monrovia parking requirements for a hotel use (Section 17.24.060, Number of Parking Spaces Required-Non-Residential Uses, of the City's Municipal Code), the proposed Project would be required to provide one parking space per guest bedroom. Therefore, the proposed Project would provide 109 spaces. Of the total 109 spaces provided on the site, one would be van-accessible, one would be fitted for electric vehicles, five would be handicapped (Americans with Disabilities Act [ADA]) accessible, and 23 would be for compact vehicles. In total, the parking lot would be 37,956 sf (51.4 percent of the Project site).

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EXTERIOR WEST ELEVATION

EXTERIOR NORTH ELEVATION

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FIGURE 2.8.a

TownePlace Suites Project

North & West Building Elevations

SOURCE: Design-Cell Architecture

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EXTERIOR EAST ELEVATION

EXTERIOR SOUTH ELEVATION

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FIGURE 2.8.b

TownePlace Suites Project

South & East Building Elevations

SOURCE: Design-Cell Architecture

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2.3.2.3 Landscaping and Fencing

As illustrated by Figure 2.9, Landscape Plan, the proposed Project would include ornamental landscaping and trees along the southern and northern boundaries of the Project site; within landscaped islands scattered throughout the on-site parking lot; along the main building entrance from the on-site parking lot, adjacent to the swimming pool area; and along the eastern boundary of the building. In total, the landscaped areas on the Project site would be 13,986 sf (18.9 percent of the Project site).

The proposed Project would include two 8-inch-thick retaining walls along the southern and western perimeters of the site. The wall along the southern perimeter of the site would be 1.03 ft. in height and the wall along the western perimeter would be 0.72 ft. in height. The Project also includes a vegetated hedge (3.5 to 4 ft. in height) and ornamental trees along the southern boundary of the site, which would serve to visually screen the Project site from residential and commercial uses south of the site.

2.3.2.4 Access

Vehicular access to the Project site would occur via two ingress/egress points: one off of West Huntington Drive near the northwestern corner of the site, and one off South Myrtle Avenue near the southeastern corner of the site. These two access points would connect to the internal circulation system. Flowering accent trees would demarcate both entry points to the site. Enhanced pavement/pavers would also be utilized at the drop-off area at the hotel entrance, the pool area, and the proposed lounge area. Figure 2.7, Site Plan, illustrates the design of the parking area.

Pedestrian access to the site would be provided via existing sidewalks along West Huntington Drive and South Myrtle Avenue. The proposed hotel structure would provide two guest entry points. One would be a pedestrian guest entrance accessible from the sidewalk on West Huntington Drive and one would be accessible from the parking lot on the southern side of the building.

The proposed Project would also include five short-term plus five long-term bicycle parking spaces near the entrance to the proposed hotel building.

2.3.2.5 Transit Service

The Project site is served by several transit lines. Specifically, Foothill Transit operates Line 270, Line 187, Line 272, and Line 494 within the vicinity of the Project site. The closest bus stations to the Project site are at South Primrose Avenue/Huntington Drive (Line 270), Huntington Drive/Myrtle Avenue West (Lines 187 and 270), Huntington Drive/Myrtle Avenue East (Lines 187 and 494), and Myrtle Avenue/Huntington Drive (Line 494). Approximately 10 additional bus stops are located within 0.5 mi of the Project site. Additionally, the Project site is located approximately 0.55 mile northeast of the Metro Foothill Gold Line Station.

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Symbol	Botanical Name	Com mon Name	Size	WU COLS Region 4
SH RUBS/ GROUNDCOVERS				
	Agave species	Agave	1 gallon	Low
	Aloe species	Aloe	1 gallon	Low
	Anigozanthos flavidus	Kangaroo Paw	1 gallon	Low
	Callistemon v. 'Little John'	Dwarf Bott lebrush	5 gallon	Low
	Cordyline 'Jurred'	Festival Grass Cordyline	5 gallon	Mo d
	Grevillea lanigera 'Coastal Gem'	Coastal Gem Wooley Grevillea	5 gallon	Low
	Hesperaloe parviflora	Red Yucca	5 gallon	Low
	Lantana montevidensis	Trailing Lantana	5 gallon	Low
	Muhlenbergiarigens	Deer Grass	5 gallon	Mod
	Myoporum parvifolium	Myoporu m	5 gallon	Low
	Pennisetum setaceum 'Rubrum'	Purple Fountain Grass	5 gallon	Low
	Phormium tenax	Hybrid New Zealand Flax	5 gallon	Mod
	Rosmar inuso. 'Marjorca Pink'	n.c.n. (upright Rosemary)	5 gallon	Low
	Salvia clevelandii	Cleveland Sage	5 gallon	Low
	Salvia gregii 'Flame'	Furman's Red Autumn Sage	5 gallon	Low
	Sedum 'Coppertone'	n.c. n.	5 gallon	Low
	Senecio mandraliscae	Blue Pickle	5 gallon	Low
	Westringia f. 'Morning Light'	Coast Rosemary	5 gallon	Low
SCREEN HEDGE				
	Dodonaea v. 'Purpurea'	Hopseed Bush	5 gallon	Mod
	Leucophyllum f. 'Compacta'	Texas Ranger	5 gallon	Low

PLANT PALETTE

Symbol	Botanical Name	Common Name	WUC OLSRegion 4
TREE S			
	Jacaranda mimosifolia	Jacaranda	Low
	Lagerstroemia indica	Crape Myrtle	Mod
	Magnolia grandi flora 'Saint Mary'	Saint Mary Southern Magnolia	Mod
	Pyrus 'Chanticleer'	Ornamental Pear	Low
	Tristania conferta	Brisbane Box	Mo d

Symbol	Botanical Name	Common Name	WUC OLSRegion 4
TREE S			
	Geijera parviflora	Australian Willow	Mo d
	Existing Tree to be Removed.		
PALMS			
	Phoenix dactylifera 'Deglet Noor'	Date Palm	Low
	Washingtonia robusta	Mexican Fan Palm	Low

NOTES: PLANT MATERIAL NOT LISTED MAY BE USED, SUBJECT TO APPROVAL BY THE CITY.
ALL LANDSCAPE PLANS AND INSTALLATIONS SHALL ADHERE TO CITY DESIGN GUIDELINES, CODES AND REGULATIONS.
ALL LANDSCAPE AREAS SHALL RECEIVE AUTOMATIC IRRIGATION SYSTEM.
ALL LANDSCAPE INSTALLATION SHALL BE PERMANENTLY MAINTAINED.

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FIGURE 2.9

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SOURCE: R.A. Smith National, Inc. (9/13/2017)

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TownePlace Suites Project
Landscape Plan

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2.3.2.6 Lighting

The proposed Project would include on-site lighting consisting of mounted parking lot lighting (approximately 25 ft. in height), low-level bollard lighting (approximately 3 ft. in height), and wall-mounted lighting. All lighting would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties.

2.3.2.7 Police and Fire Access

Emergency vehicles would be able to enter and exit the Project site via the access point off West Huntington Drive and South Myrtle Avenue. Per Monrovia Municipal Code Section 15.20.140 (amending Section 903.2 of the 2013 International Fire Code), an automatic sprinkler system would be installed in the proposed building. The proposed Project does not include the installation of fire hydrants on the Project site.

2.3.2.8 Sustainability Features

The proposed Project would be consistent with the California Green Building Standards Code (CALGreen Code).

2.3.2.9 Water Quality Best Management Practices

The proposed Project would comply with the requirements of the Los Angeles Regional Water Quality Control Board (RWQCB) Municipal Separate Storm Sewer System MS4 Permit for the Coastal Watersheds of Los Angeles County (Order No. R4-2012-0175; National Pollutant Discharge Elimination System [NPDES] No. CAS004001). In compliance with the requirements of this permit, the proposed Project would implement Low Impact Development (LID) and Source Control BMPs. The proposed LID BMPs include one underground infiltration chamber in the parking lot in the northwest portion of the Project site. Proposed routine non-structural Source Control BMPs include education for property owners, tenants, and occupants; activity restrictions; BMP maintenance; Title 22 California Code of Regulations (CCR) Compliance; spill contingency plan; uniform fire code implementation; common area litter control; employee training; housekeeping of loading docks, common area catch basin inspection; and street sweeping of private streets and parking lots. Proposed routine structural Source Control BMPs include provision of storm drain stenciling and signage, design and construction of trash and waste storage areas to reduce pollution introduction; use of efficient irrigation systems and landscape design, and water conservation, smart controllers, and source control.

2.3.3 General Plan and Zoning

2.3.3.1 General Plan

According to the Land Use Element of the City's General Plan, the Project site is in the Crossroads District. Within the Crossroads District, the Project site is designated as Business Enterprise (BE). The proposed Project includes a General Plan Amendment (GPA) to modify the land use designation of the eastern portion of the Project site from BE to Office/Research and Development/Light Manufacturing (ORDLM). According to the City of Monrovia General Plan, the ORDLM designation allows for high-quality office, research and development, and support uses (e.g., restaurants, health clubs, and banks). As part of the GPA request, the proposed Project would also request that hotels

be included as an allowable use within the areas of the Crossroads District with the ORDLM designation. The maximum intensity of development with a surface parking lot within the ORDLM designation is a floor-area ratio (FAR) of 2.0[1] and the maximum building height is four stories. As part of the proposed Project, the conflicting standard of 0.75 FAR is being removed from the Urban Design-Public Realm standards in the General Plan. The proposed Project would develop the site at an approximate 0.91 FAR. The GPA for the Project would also include a request to increase the allowable building height within the ORDLM designation in the Crossroads District from four to five stories, or a maximum of 65 ft. Refer to Figure 2.10, General Plan Amendment Area, for an illustration of the parcels affected by the proposed GPA. The existing General Plan land use designations for the site are illustrated on Figure 2.11, Existing General Plan Land Uses.

It should be noted that the original Project analyzed in this IS/MND included a proposed GPA on the Taco Bell property immediately west of the Project site. The Project has since been revised and the GPA is no longer proposed for this property. While the analysis and conclusions in this IS/MND reflect this change, it should be noted that the Traffic Impact Assessment (TIA) for the proposed Project (provided in Appendix I) analyzed traffic impacts related to proposed hotel development on the Project *and* the potential increase in development intensity on the parcels included in the proposed GPA. Therefore, the analysis and conclusions in the TIA and the corresponding Transportation/Traffic section of this IS/MND reflect a "worst-case" scenario. The removal of the proposed GPA on the Taco Bell property would not result in new or substantially more severe environmental impacts than those analyzed in the TIA and this IS/MND.

2.3.3.2 City of Monrovia General Plan Land Use Element

The City of Monrovia General Plan Land Use Element was adopted in 2008 and was last updated in 2015. The purpose of the Land Use Element is to establish the overall policy direction for land use planning decisions in the City. Goals and policies included in the Land Use Element guide future development in the City and reflect the policies and programs established in other elements of the City's General Plan.

In reviewing the current Land Use Element (adopted in 2008/revised in 2015), City staff identified typographical errors and textual revisions in several sections of the element. The proposed text amendments include revisions to clarify general language describing building intensity and density; the removal of the two-story height limitation and subterranean parking lot requirement for the Retail Corridor Mixed Use land use designation; the removal of language regarding allowable uses, development patterns, and entitlements for the Specific Plan/Planned Development Overlay designation; the addition of two faults listed as natural constraints in the City; the addition of background information in the Old Town Extension District section; reorganizing subsections within the Urban Design Section; and the removal of the "Creating a Plan for South Myrtle Avenue" section. The intent of these revisions is to remove superfluous and/or outdated language, provide clarifying language, and provide for more clear and concise descriptions of land use designations and districts.

[1] FAR is the ratio of a building's gross floor area to the size of the land upon which it is built.

LSA

LEGEND

- Project Site
- Area Proposed for General Plan Amendment
- Crossroads District

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0 125 250

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SOURCE: Google Earth, 2017

FIGURE 2.10

TownePlace Suites Project

Proposed General Plan Amendment Area

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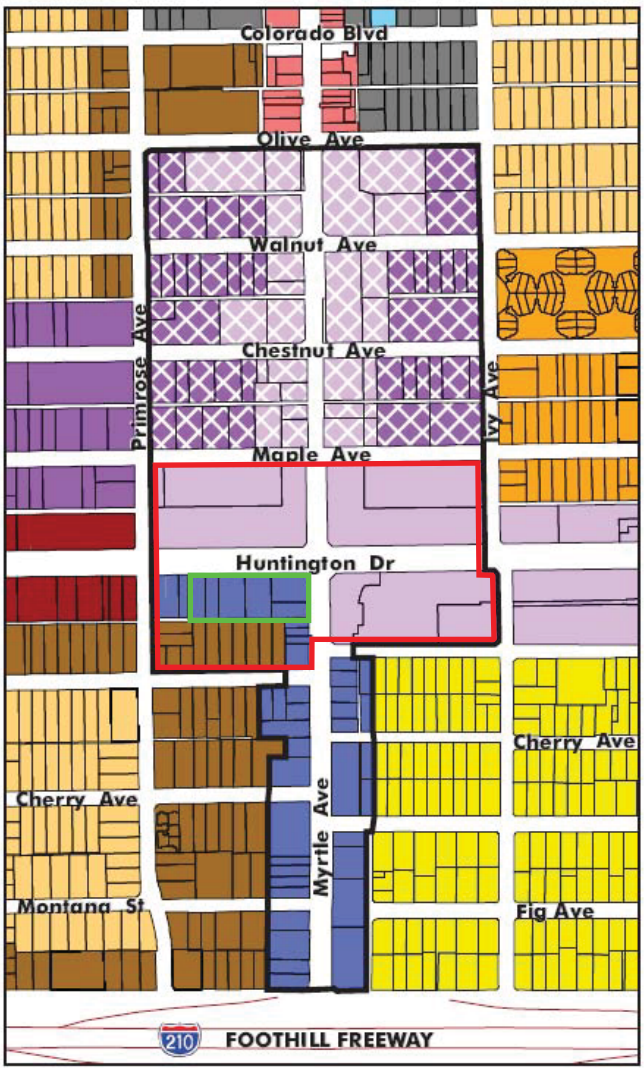
PROPOSED LAND USE DESIGNATION

- Residential Low (5.8 du/ac)
- Residential Medium (5.8-17.4 du/ac)
- Residential Medium/High (5.8-54 du/ac)
- Residential High (54 du/ac)
- Historic Commercial Downtown
- Retail Corridor Commercial
- Business Enterprise
- Office/Research and Development/Light Manufacturing
- Manufacturing
- Public/Quasi-Public
- Planned Development
- Specific Plan/Planned Development Overlay

BASE FEATURES

- South Myrtle Avenue Corridor



LSA

LEGEND

- Project Site
- Crossroads District

N

0 400 800

FEET

SOURCE: City of Monrovia, GIS 2006

I:\THA1601\G\Gen_Plan_Land_Use.cdr (5/17/2018)

FIGURE 2.11

TownePlace Suites Project

Existing General Plan Land Uses

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While not directly related to the proposed Hotel Project, these changes are addressed throughout this IS/MND to ensure compliance under the California Environmental Quality Act (CEQA). Therefore, in addition to the GPA to amend the land use designation on the site, allow hotel uses within areas of the Crossroads District with the ORDLM designation, increase the maximum allowable height of structures within the Crossroads District from four to five stories (or 65 ft.), and to clarify the FAR on the Project site, the Project also includes the aforementioned text amendments to the City's General Plan Land Use Element. Refer to Appendix A for a strikeout/underline version of proposed changes to the City's Land Use Element.

2.3.3.3 Zoning

The existing zoning classification for the Project site is BE. According to Chapter 17.08, Permitted Uses, of the City's Municipal Code, the BE zone allows for athletic clubs, automobile accessory services, automobile parking, automobile rentals, business support services, child care services, communication services, financial institutions, instructional services, medical laboratory services, medical outpatient facilities, restaurants, retail, service commercial, veterinary services, light manufacturing, postal service, research and development, warehousing/wholesaling, cultural exhibits, and utility distribution facilities, as well as several conditionally permitted uses. The proposed Project includes a Zoning Map Amendment to designate the Project site as ORDLM and would also require a Zoning Code Amendment to allow hotel uses in areas of the Crossroads District with the ORDLM zoning classification upon approval of a Conditional Use Permit (CUP). The existing zoning classifications for the site are illustrated on Figure 2.12, Existing Zoning Classifications.

In addition to a GPA, a Zoning Map Amendment, and a Zoning Code Amendment, the proposed Project also includes a Tentative Parcel Map to consolidate the six on-site parcels into one parcel; CUPs to allow for new construction, hotel uses, and on-site alcohol consumption (if requested); and a Minor Exception to allow for use of 23 compact parking stalls towards the Project's total parking requirement.

2.3.4 Infrastructure Improvements

2.3.4.1 On-Site and Off-Site Infrastructure

The Project infrastructure to be implemented would require connections to existing off-site infrastructure systems. These systems include electricity, water, sanitary sewer, and stormwater drains. Figure 2.13, Utility Plan, depicts the existing on-site infrastructure and proposed utility improvements. The proposed Project includes the construction of the following infrastructure improvements:

- A 4-inch water service line with a 3-inch water meter in the northern/central portion of the site.
- A 6-inch fire service line.
- A 6-inch sewer service line on the eastern boundary of the site.
- An infiltration chamber within the on-site parking lot.
- An 8-inch water main extending from near the intersection of Primrose Avenue and Huntington Drive, east on Huntington Drive (north side of right-of-way) until such line reaches a point near the Project site (approximately 300 ft.). The water main extension would then terminate.

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LSA

Project Location

Area Proposed for Hotel Development

Zoning

- Business Enterprise
- Historic Downtown Commercial
- Manufacturing
- Office/Research & Development/Light Manufacturing
- Planned Development
- Public/Quasi Public
- Residential High
- Residential Low
- Residential Medium 2500
- Residential Medium 3500
- Residential Medium 3500/Planned Unit Development
- Residential Medium-High
- Retail Corridor Commercial
- Specific Plan

N

0 250 500

FEET

SOURCE: City of Monrovia (2010)

I:\THA1601\GIS\Zoning.mxd (6/5/2018)

FIGURE 2.12

TownePlace Suites Project

Existing Zoning Classifications

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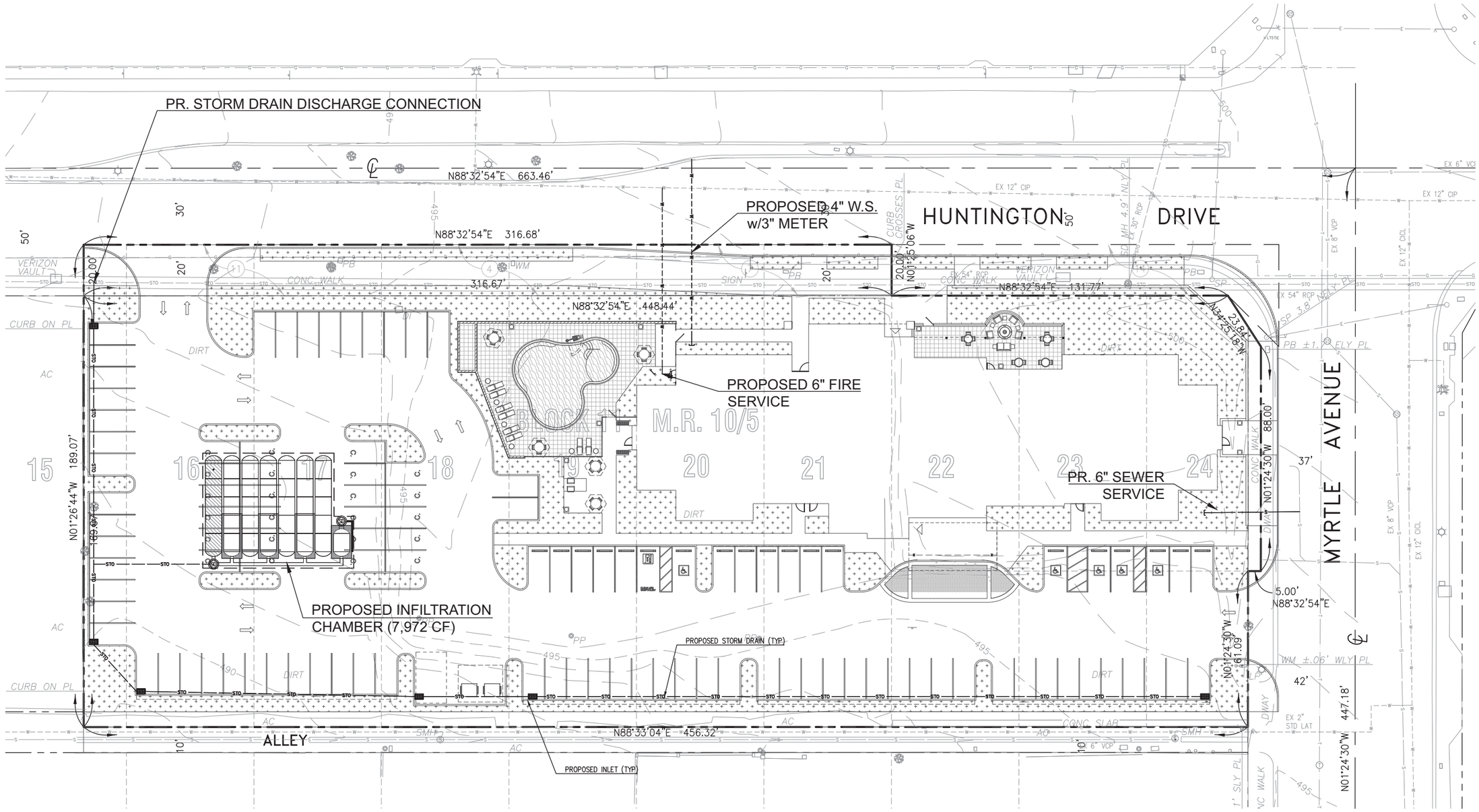

LSA

FIGURE 2.13

0 20 40
FEET

SOURCE: R.A. Smith National, Inc. (8/14/2017)

I:\THA1601\G\Utility_Plan.cdr (4/26/2018)

TownePlace Suites Project
Utility Plan

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- Installation of a hydrant lateral, a fire line lateral, and a service lateral that would extend to the south side of the Project site.
- A storm drain inlet and storm drain discharge connection near the northwestern corner of the site.
- A storm drain and five storm drain inlets along the southern boundary of the site.

2.3.5 Implementation/Phasing

Project construction would generally occur in the following four steps:

- Phase 1: Site Preparation
- Phase 2: Grading
- Phase 3: Construction
- Phase 4: Paving

The Project would begin with site preparation, grading, construction, and paving. Construction trips that would be generated on a daily basis throughout each phase of construction would derive from construction workers and delivery of construction materials. Grading activities on the site would involve the import of approximately 2,016 cubic yards (cy) of fill. With the assumption that each haul truck would have a capacity of 14 cy, approximately 144 trucks would be required to deliver 2,016 cy of soil to the Project site (each truck would make one inbound trip and one outbound trip for a total of 288 trips per construction period). During peak grading periods, the proposed Project construction is anticipated to generate up to 21 daily haul trucks (and up to a total of 42 trips per day) that would be distributed throughout an 8-hour day.

The majority of construction workers would arrive and depart outside the peak hours,[2] while delivery trucks and haul trucks would arrive and depart throughout the day. For the purposes of this analysis in this IS/MND, it is estimated that 12.5 percent of delivery trips would occur during each peak hour. Project construction is anticipated to commence in December 2018 and would occur over the course of 14 to 16 months. The expected date of completion is April 2020. With the exception of equipment and worker vehicles needed for utility line extensions, all construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period.

2.4 DISCRETIONARY ACTIONS

Development of the proposed Project would require discretionary approvals by the City of Monrovia as the Lead Agency. The City's discretionary actions would include the following:

- **General Plan Amendment.** The Project proposes several changes to the City's General Plan Land Use Element. These changes are listed and described as follows:
    - Add hotel use as an allowable land use within the ORDLM Land Use District in the Crossroads District.

[2] The weekday a.m. peak period is 7:00 a.m. to 9:00 a.m. and the weekday p.m. peak period is 4:00 p.m. to 6:00 p.m.

- Increase the maximum allowable height of structures within the Crossroads District from four to five stories (or 65 ft.).
- Amend the land use designation on the Project site from BE to ORDLM. This change shall be reflected on Figure 1—General Plan Land Use Map, and Figure 3—South Myrtle Avenue Land Use Plan.
- Text changes to the City's Land Use Element to correct typographical errors (refer to Appendix A).
- Amend the Floor Area Ratio (FAR) for the ORDLM Land Use District in the Crossroads District from 0.75 to 2.0.

- **Zone Change.** The proposed Project would change the zoning of the Project site from BE to ORDLM. In addition, the Zoning Code would be amended to allow hotel use areas of the Crossroads District with the ORDLM zoning classification.
- **Conditional Use Permits.** CUPs are required for new construction, the proposed hotel use, and on-site alcohol consumption (if requested).
- **Minor Exception.** A minor exception would be needed for use of 23 compact parking stalls toward the total parking requirement.
- **Tentative Parcel Map.** A Tentative Parcel Map is required to consolidate the existing six parcels on the hotel property into one parcel.
- **Alleyway Dedication.** The Project would dedicate 6 ft. along the southern Project boundary to ensure the adjacent alleyway would be a minimum of 16 ft. wide after Project construction.
- **Roadway Dedication.** The Project would dedicate 5 ft. along the northerly section of the Myrtle Avenue street frontage. This would provide enough land to allow for a 42 ft. half-right-of-way for Myrtle Avenue. The Project would also include a 20 ft. dedication along the westerly section of the Huntington Drive street frontage. This would provide enough land to allow for a 50 ft. half-right-of-way for South Myrtle Avenue.
- **General Plan Conformity Finding.** The Project would require a General Plan Conformity Finding for the proposed dedications along South Myrtle Avenue, West Huntington Drive, and the alley south of the Project site.

2.5 PROBABLE FUTURE ACTIONS BY RESPONSIBLE AGENCIES

The proposed Project will require approvals, permits, or authorization from other agencies, classified as "Responsible Agencies" under CEQA. According to Section 15381 of the *State CEQA Guidelines*, a Responsible Agency is defined as a public agency other than the Lead Agency that will have discretionary approval power over the Project or some component of the Project, including mitigation. These agencies include, but are not limited to, the agencies identified in Table 2.A.

Table 2.A: Probable Future Actions by Responsible Agencies

Agency	Action
State Water Resources Control Board	• Developer must submit Permit Registration Documents, including a Notice of Intent, to comply with the National Pollutant Discharge Elimination System Construction General Permit (Order No. Order 2009-0009-DWQ)

2.6 OTHER MINISTERIAL CITY ACTIONS

Ministerial permits/approvals would be issued by the City or other appropriate agency to allow site preparations, curb cuts (if necessary), connections to the utility infrastructure, and other Project features subject to ministerial permits.

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3.0 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 & Forest 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	☒ Tribal Cultural Resources	☒ Utilities/Service Systems
☒ Mandatory Findings of Significance		

DETERMINATION. On the basis of this initial evaluation:

1. I find that the Project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐

2. 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. ☒

3. I find the proposed Project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

4. 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. ☐

5. 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. ☐

Project Planner, Planning Division Manager _____ Date _____

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4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION OF ENVIRONMENTAL CHECKLIST QUESTIONS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced, as discussed below).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c)(3)(D)). In this case, a brief discussion should identity the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 AESTHETICS.

Would the Project:

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 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?	☐	☒	☐	☐

Discussion:

A portion of the following section is based on the *Photometric Plan* prepared by CREE (October 2017). The Photometric Plan is included in Appendix B.

Impact Analysis:

(a) Would the Project have a substantial adverse effect on a scenic vista?

Hotel Development. California State Government Code Section 65560(b)(3) stipulates that city and county General Plans address "…Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historical and cultural value; areas particularly suited for park and recreation purposes, including access to lakes shores, beaches, and rivers, and streams; and areas which serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors…"

A scenic vista is the view of an area that is visually or aesthetically pleasing from a certain vantage point. It is usually viewed from some distance away. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The proposed Project would be located the southwestern corner of West Huntington Drive and South Myrtle Avenue in an urbanized area of the City of Monrovia (City). The majority of the Project site is currently characterized by an undeveloped dirt lot, with the exception of the westernmost portion of the site, which is developed with an existing Taco Bell restaurant. While there are no locally designated scenic vistas in the City, distant views of the San Gabriel Mountains are visible from various vantage points throughout the City, including from areas on and within the vicinity of the Project site.

Construction. Development of the proposed Project would require site preparation, grading, and construction activities. Construction activities would be visible to travelers along West Huntington Drive, South Primrose Avenue, and South Myrtle Avenue; residents south of the site; and surrounding businesses. Any partial obstruction of scenic views of the San Gabriel Mountains as a result of construction activities would be short-term in nature and would cease upon Project completion. In addition, construction equipment is not of sufficient height or mass to substantially block views of distant scenic vistas. Therefore, construction impacts related to adverse effects on a scenic vista would be less than significant, and no mitigation would be required.

Operation. There are no locally designated scenic vistas in the City. While no designated scenic vistas or vantage points exist on the Project site, members of the public may access distant views of the San Gabriel Mountains from the Project site and from roads and sidewalks surrounding the site. As depicted by Figures 4.1 and 4.2, Key View Location Map, and Line of Sight Figures, implementation of the proposed Project would partially block views of the San Gabriel Mountains from public vantage points along West Cypress Avenue and residential uses south of the site. While the partial obstruction of views of the San Gabriel Mountains would occur as a result of Project implementation, the overall views of the mountains would not be substantially affected by development of the site due to the prominence of the San Gabriel Mountains. Furthermore, landscaping elements included as part of the Project would serve to enhance and frame views of the mountains from roadways and sidewalks within the project vicinity. For example, the proposed Project would include the addition of on-site landscaping along South Myrtle Avenue and West Huntington Drive, which would serve to frame scenic views of the San Gabriel Mountains from these roadways and would partially block views of the proposed development. Therefore, potential impacts of the proposed Project on scenic vistas would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts to scenic vistas. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects to scenic vistas, and no mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts to scenic vistas. However, future projects facilitated by approval of the proposed GPA would be required to comply with applicable height restrictions and Design Guidelines (including height standards) in the City's General Plan Land Use Element. Additionally, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*.

LSA

FIGURE 4.1

N

TownePlace Suites Project

Key View Location Map

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Eye-Level 1

Eye-Level 2

LSA

FIGURE 4.2

TownePlace Suites Project

Line of Sight Figures

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Therefore, the proposed GPA would not result in substantial adverse effects to scenic vistas, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. The California Department of Transportation's (Caltrans) Landscape Architecture Program administers the Scenic Highway Program, contained in Streets and Highways Code Sections 260–263. State highways are classified as either Officially Listed or Eligible. The portion of Interstate 210 (I-210) located approximately 0.27 mile south of the Project site is identified as an Eligible State Scenic Highway, but is not officially designated as a scenic highway by Caltrans.[3] Therefore, the proposed Project does not have the potential to damage resources within a State-designated scenic highway.

In addition, no existing aesthetic or visual resources are located on the Project site or in the surrounding vicinity have been designated in the City's General Plan. No existing scenic rock outcroppings are located within the Project limits. Therefore, the proposed Project would not result in a significant impact to scenic resources. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts to scenic resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects to scenic resources within a State-designated scenic highway, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts to scenic resources. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial adverse impacts to scenic resources within a State-designated scenic highway, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

[3] California Department of Transportation (Caltrans). California Scenic Highway Mapping System (Los Angeles County). Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm (accessed October 11, 2017).

(c) Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Hotel Development. The Project site is located within a developed area in the City of Monrovia. The existing site is rectangular in shape and encompasses 1.71 acres. In its existing setting, the site is characterized by a vacant dirt lot.

Construction. Construction of the proposed Project would require excavation, grading, and construction activities. Construction activities would be visible to travelers along West Huntington Drive, South Primrose Avenue, and South Myrtle Avenue; residents south of the site; and surrounding businesses. Construction activities would be short-term in nature and, with the exception of equipment and worker vehicles needed for utility line extensions, all construction vehicles and equipment would be staged on the Project site throughout the duration of the construction period. Temporary construction fencing would be placed along the perimeter of the undeveloped portion of the site to visually screen construction activities from the street level. It is recognized that construction fencing could serve as a potential target for graffiti if not appropriately monitored. Mitigation Measure AES-1 would require that temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period. Mitigation requiring the maintenance of the Project site fencing would ensure that impacts associated with unwanted debris and graffiti would be less than significant. Furthermore, visual impacts during construction would be temporary in nature and would cease upon Project completion. Therefore, construction impacts related to the degradation of the existing visual character of the Project site would be less than significant with implementation of Mitigation Measure AES-1.

Operation. The Project site is characterized by a dirt lot with scattered debris; therefore, the site currently exhibits a neutral or negative visual character in the Project vicinity. Implementation of the proposed Project would result in the development of a new hotel use that would exhibit a modern architectural style. As illustrated by Figure 4.3, Building Renderings, the hotel building would also feature varied façades and roof lines, large windows, and a modern color palette that would create interest and highlight the varied building features. Building materials on the ground floor would be stone veneer, and painted Exterior Insulation and Finish System (EIFS) would be utilized for the upper floors of the building. The hotel would also include a metal roof, fiber cement siding panels on the building façade, and aluminum mechanical grills around the windows.

The landscaping plan for the Project site would include a mix of trees and shrubs (refer to Figure 2.9, Landscape Plan, in Chapter 2.0, Environmental Setting and Project Description). Specifically, flowering accent trees and perimeter landscaping would line the northern and eastern boundaries of the site, a screen hedge (3.5 to 4 ft. in height) and a row of screen buffer trees would line the southern boundary of the site, and ornamental trees and landscaping would be scattered throughout the on-site parking lot. Additionally, entry flowering accent trees would be located at the two access points off of West Huntington Drive and South Myrtle Avenue. The Project would also include ornamental landscaping near the building entrance and within the pedestrian plaza area at the north end of the building along West Huntington Drive.

LSA

FIGURE 4.3

TownePlace Suites Project
Building Renderings

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The proposed design includes the pedestrian plaza area and ornamental landscaping along the northern boundary of the site, which would be visible to pedestrians, bicyclists, and motorists from South Myrtle Avenue and West Huntington Drive. This area would include vegetation, pedestrian furniture, and a trellis to further characterize the Project site as a gateway into the City and enhance the vividness of the site from surrounding roadways and sidewalks.

At its zenith, the proposed building would be 65 ft. in height, which includes a 10.5 ft. height increase from the building's second parapet to the top of the proposed roofline. The proposed roofline would be angular in some areas on the north and south elevations, but would be uniformly horizontal on the east and west elevations. While the proposed hotel building would be developed at a greater height than existing one- and two-story residential, commercial, and office uses in the Project vicinity, the building would be visually screened by on-site vegetation and would be set back from the site boundaries to reduce the overall scale and mass of the building. Additionally, the modern architectural style of the building would be compatible with the mixed architectural styles of the neighborhood (e.g., office uses north of the site exhibit Contemporary and Modern architectural styles). Furthermore, landscaping would be similar to, or an improvement to, existing landscaping in the surrounding area. Therefore, because the proposed Project would develop the currently vacant site with a hotel use in an already developed area and would be compatible with the surrounding development, the proposed Project would not degrade the character or quality of the Project site, nor would the proposed Project contribute to an overall degradation of the visual character or quality of the surrounding area. Implementation of the proposed Project would, therefore, result in less than significant visual character impacts, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the adverse impacts to the visual character or quality. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects to the scenic quality and visual character of sites throughout the City, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts related to the scenic quality. However, future projects facilitated by approval of the proposed GPA would be required to comply with Urban Design Guidelines included in the City's General Plan LUE. In addition to prohibiting new development that would compromise neighborhood quality and scale, the Urban Design Guidelines require new development along South Myrtle Avenue to incorporate high-quality architectural elements and treatments, install new public art, and provide street trees and landscaped open areas (i.e., courtyards and plazas), and pedestrian-scaled lighting. Compliance with applicable provisions of the City's Land Use Element would ensure that future developments would improve the visual character and quality of the Crossroads District area. In addition, future individual projects resulting from the approval of the proposed LUE would also

be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial adverse effects related the scenic quality and character of the Project site and surrounding area, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

AES-1 **Maintenance of Construction Barriers.** Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours."

Significance Determination after Mitigation: Less Than Significant

(d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Hotel Development. Spill light occurs when lighting standards, such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting, are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. The spillover of light onto adjacent properties has the potential to interfere with certain activities, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. Light-sensitive uses include residential, some commercial and institutional uses, and, in some situations, natural areas. Changes in nighttime lighting may become significant if a proposed Project substantially increases ambient lighting conditions beyond its property line and Project lighting routinely spills over into adjacent light-sensitive land uses areas.

The City's Municipal Code Section 17.32.080 states the following, "lighting where provided to illuminate private property shall be so arranged as to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment."

Reflective light (glare) is the result of sunlight or artificial light reflecting from finished surfaces (e.g., window glass) or other reflective materials. Glass and other materials can have many different reflectance characteristics. Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. Reflective light is common

in urban areas. Glare generally does not result in the illumination of off-site locations but results in a visible source of light viewable from a distance.

The City's Municipal Code Section 17.32.090 states the following, "no direct or reflected glare, whether produced by floodlight, high temperature processes such as combustion or welding, or other processes, so as to be visible from the boundary line of property on which the same is produced, shall be permitted. Sky-reflected glare from buildings or game courts shall be so controlled by such reasonable means as are practical to the end that the sky-reflected glare will not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs."

Currently, there are no existing sources of light or glare emanating from the undeveloped portion of the Project site. Existing residential uses south of the Project site are currently exposed to light and glare from the Taco Bell restaurant abutting the western boundary of the Project site and office and commercial uses within the vicinity of the Project site. Street lighting, signalized intersections, existing development, and motorists are the dominant sources of existing light near the Project site. Existing distant development also contributes to light in the Project vicinity.

Construction. Short-term construction activities would occur primarily during daylight hours; however, the Project may require periodic nighttime lighting. Any construction-related illumination during evening hours would be shielded to the extent feasible and would consist of the minimal lighting required for safety and security purposes and would only occur on a temporary and as-needed basis. Due to its limited scope and duration, light generated during Project construction would not substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, construction lighting impacts would be less than significant, and no mitigation would be required.

Operation. The proposed Project would introduce new light sources that are typical of commercial development projects. Specifically, the proposed Project would include mounted parking lot lighting (approximately 25 feet [ft.] in height), low-level bollard lighting (approximately 3 ft. in height), and wall-mounted lighting. All exterior lighting would be shielded and directed downward to avoid off-site spill. In addition, lighting would be provided along internal walkways to provide security lighting. The proposed building would be lighted during nighttime hours for hotel guests; however, light emitted from within the proposed hotel rooms is anticipated to be minimal as compared to light emitted from the proposed pole-mounted light fixtures within the on-site parking lot and wall-mounted lighting on the proposed hotel building.

The Project site is located in a developed urban area with existing nighttime lighting. Development of the proposed Project would result in an increase in light in the Project area. Street lights and light associated with existing development in the Project vicinity would continue remain the most significant source of light following Project implementation. However, the proposed Project would result in a substantial amount of new nighttime light on the Project site even with lighting features included to reduce lighting effects. According to the Conceptual Photometric Plan prepared for the Project (Appendix B), the Project would generate a spill light

on West Huntington Drive, South Myrtle Drive, the existing Taco Bell property west of the site, and on the alleyway and residential properties south of the site. While the Project would generate spill light on the Taco Bell portion of the site and on roadways bounding the site, commercial uses and roadways are not considered sensitive uses for purposes of analyzing lighting impacts. Therefore, this analysis focuses on potential impacts to sensitive residential uses in the Project vicinity.

Residential uses closest to the site are located approximately 10 ft. south of the site across an existing alleyway. The Project would dedicate 6 ft. of property along the southern boundary of the site to ensure that the alleyway located south of the site would be a minimum of 16 ft. wide. The increased distance between the southern boundary of the site and residential uses south of the site provided by the alleyway dedication would serve to reduce impacts related to spill light on residential uses south of the site. The Project would also include ornamental trees along the southern boundary of the site that would shield light generated from the site on residential uses to the south. Furthermore, residences south of the site face West Cypress Avenue with their associated rear yards and covered parking structures facing the alleyway along the southern boundary of the site. As such, spill light occurring along the southern boundary of the site would illuminate portions of rear yards and covered parking areas and would not directly illuminate the residential structures.

Lighting plans are subject to City review and approval as part of the site plan review process. Therefore, although it is known that the proposed Project would include several features to minimize potential lighting impacts on residences south of the site, Mitigation Measure AES-2 requires the Developer to prepare a final lighting plan that would illustrate the final locations for parking lot lights, walkway lights, and landscaping lights and demonstrate consistency with the City's Municipal Code. This measure is intended to minimize impacts associated with new sources of light and glare on the Project site to adjacent sensitive land uses. Implementation of this mitigation measures would reduce potentially significant impacts of new lighting to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the introduction of new sources of light or glare in the City. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects related to light and glare, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts related to light and glare. However, future individual projects resulting from approval of the proposed GPA would be required to comply with Mitigation Measures AES-A and AES-B of the City's General Plan Land Use and Circulation Elements EIR, which mandate that future projects incorporate features to reduce adverse light and glare impacts and prohibit the use of reflective glass, metallic, and other reflective glare-producing materials. In addition, future individual projects resulting from

the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines* and would also be required to comply with the City's Zoning Code regulations pertaining to glare and outdoor lighting. Therefore, the proposed GPA would not result in substantial adverse effects related light and glare, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

AES-2 **Comprehensive Lighting Plan.** Prior to issuance of a building permit, the Project Developer shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America's [IESNA]) and shall be in compliance with applicable standards of the City's Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, on-site driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer:

- Exterior on-site lighting shall be shielded and confined within site boundaries.
- No direct rays or glare are permitted to shine onto public streets or adjacent sites.
- Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted.
- The site shall not be excessively illuminated based on the illumination recommendations of the IESNA.

Significance Determination after Mitigation: Less Than Significant

4.2 AGRICULTURE & FOREST RESOURCES.

Would the Project:

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 the 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?	☐	☐	☐	☒

Impact Analysis:

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

Hotel Development. The Project site is not used for agricultural production and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[4] The surrounding area is characterized by urbanized and developed uses, including office, residential, and industrial. Therefore, the proposed Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a nonagricultural use. No impacts would occur, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse effects to agricultural resources. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a nonagricultural use, and no mitigation would be required.

[4] As with most properties in developed areas of Los Angeles County, the Project site is located in an area that has not mapped by the Farmland Mapping and Monitoring Program.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, the parcels affected by the proposed GPA are not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed GPA would not result in impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a nonagricultural use, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Hotel Development. The Project site currently has a zoning designation of Business Enterprise (BE), which does not allow agricultural use. The Project site is not used for agricultural production, not zoned for agricultural use, and is not protected by, or eligible for, a Williamson Act contract. No impacts would occur, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result adverse effects to agricultural resources. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with existing zoning for agricultural uses or a Williamson Act contract, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, the parcels affected by the proposed GPA are currently zoned BE and are not protected by, or eligible for, a Williamson Act contract. Therefore, the proposed GPA would not result in conflicts with existing zoning for agricultural uses or a Williamson Act contract, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project 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))?

Hotel Development. The City of Monrovia has an Angeles National Forest zoning classification, which is applied to all property within the City that is also within the boundary of the Angeles National Forest. This zone is located in the northern portion of the City.

As previously stated, the Project site currently has a zoning designation of BE. The Project site currently consists of an undeveloped dirt lot and a restaurant on the westernmost portion of the site. The Project site is located within the City of Monrovia, which itself is highly urbanized and developed with residential and commercial uses. The Project site is not used for timberland production, not zoned as forest land or timberland, and does not contain forest land or timberland. No impacts would occur, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result adverse effects to forest land or timber land. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with existing zoning for forest land or timberland production, and no mitigation would be required.

As previously stated, parcels affected by approval of the GPA are currently zoned BE. These parcels are currently developed with office, commercial, and residential uses and are not currently utilized for forest land or timberland production. Therefore, the proposed GPA would not result in impacts related to conflicts with existing zoning for forest land or timberland production, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Hotel Development. Refer to Response 4.2(c), above.

General Plan Land Use Element Amendment. Refer to Response 4.2(c), above.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(e) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Hotel Development. The Project site currently has a zoning designation of BE, which does not allow agricultural use. The Project site is not used for agricultural production nor is the site designated or zoned for agricultural uses. The proposed Project would not convert farmland to a nonagricultural use. Likewise, the Project site would not contribute to environmental changes that could result in conversion of farmland to nonagricultural uses. No impacts would occur, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result adverse effects to farmland. Therefore, the proposed textual amendments to the LUE would not contribute to environmental changes that could result in the conversion of farmland to nonagricultural uses, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, the parcels affected by the proposed GPA are not currently used for agricultural production or are these parcels designated or zoned for agricultural uses. Therefore, the proposed GPA would not contribute to environmental changes that could result in the conversion of farmland to nonagricultural uses, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.3 AIR QUALITY.

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 ambientair 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?	☐	☐	☒	☐

Discussion:

The following section is based on air quality modeling and analysis conducted by LSA Associates, Inc. (LSA) (October 2017). The air quality modeling worksheets are included in Appendix C.

Impact Analysis:

(a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Hotel Development. The Project site is located within the City of Monrovia, which is part of the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD and the Southern California Association of Governments (SCAG) adopted the *2016 Air Quality Management Plan* (2016 AQMP) in March 2017.

The main purpose of an Air Quality Management Plan (AQMP) is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area. A nonattainment area is considered to have worse air quality than the National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS), as defined in the federal Clean Air Act. The Basin is in nonattainment for the federal and State standards for ozone (O_3), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition, the Basin is in nonattainment for the State particulate matter less than 10 microns in diameter (PM_{10}) standard, and in attainment/maintenance for the federal PM_{10}, carbon monoxide (CO), and nitrogen dioxide (NO_2) standards.

Consistency with the 2016 AQMP for the Basin would be achieved if a project is consistent with the goals, objectives, and assumptions in the respective plan to achieve the federal and State air quality standards. Per the SCAQMD *CEQA Air Quality Handbook* (April 1993), there are two main

indicators of a project's consistency with the applicable AQMP: (1) whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2016 AQMP; and (2) whether the project would exceed the 2016 AQMP's assumptions for 2030 or yearly increments based on the year of project buildout and phasing. For the proposed Project to be consistent with the AQMP, the pollutants emitted from the Project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality. Additionally, if feasible mitigation measures are implemented and are shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP.

The Project site is designated as Business Enterprise (BE) in the City of Monrovia's (City) General Plan and is zoned BE on the City's Zoning Map. The BE General Plan designation allows for retail, office, research and development, and light industrial uses. The BE zoning designation allows for certain uses such as athletic clubs, automobile accessory services, business support services, childcare services, restaurants, retail and commercial services, as well as several conditionally permitted uses. As the proposed Project would involve construction and operation of a hotel, a General Plan Amendment (GPA) would be required to ensure consistency with the City's General Plan. Following approval of a GPA, the Project would be consistent with applicable goals and policies included in the City's General Plan. As noted in the description of the allowable uses under the BE designation, the proposed hotel use would be similar in terms of the population and employment assumptions used in the 2016 AQMP under the current BE land use designation for the Project site. Therefore, the proposed Project would not conflict with the 2016 AQMP. Furthermore, as discussed in Responses 4.3(b) through 4.3(e), emissions generated by the proposed Project would be below emissions thresholds established in SCAQMD's *Air Quality Significance Thresholds* (March 2015) and would not be expected to result in significant air quality impacts. Therefore, the proposed Project would not conflict with the AQMP and would not conflict with or obstruct implementation of the AQMP. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the generation of air quality emissions that would potentially conflict with an applicable air quality plan. Therefore, the proposed textual amendments to the LUE would not conflict with or obstruct implementation of the applicable air quality plan, and no mitigation would be required.

Although the proposed GPA to the City's Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would generate air quality emissions. However, future individual projects resulting from approval of the proposed GPA would be required to comply with Mitigation Measures AIR-A through AIR-C and Mitigation Measure AIR-E in the City's General Plan Land Use and Circulation Elements EIR. Specifically,

these measures require that applicants analyze construction air quality impacts and local CO hot-spots associated with new development projects, prepare plans for reducing NO_x emissions (if required), and adhere to vehicular idling restrictions. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not conflict with or obstruct implementation of the applicable air quality plan, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Hotel Development. The *State CEQA Guidelines* indicate that a significant impact would occur if a project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Specific criteria for determining whether the potential air quality impacts of a project are significant are set forth in SCAQMD's *Air Quality Significance Thresholds* (March 2015). The criteria include emission thresholds, compliance with State and national air quality standards, and conformity with the existing State Implementation Plan (SIP) or consistency with the current AQMP. A summary of the specific criteria established by the SCAQMD is presented in Table 4.3.A below.

Table 4.3.A: SCAQMD Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
ROCs	75 lbs/day	55 lbs/day
CO	550 lbs/day	550 lbs/day
NO_X	100 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day

Source: South Coast Air Quality Management District. *Air Quality Significance Thresholds* (March 2015).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrous oxides
$PM_{2.5}$ = particular matter less than 2.5 microns in size
PM_{10} = particular matter less than 10 microns in size
ROCs = reactive organic compounds
SO_X = sulfur oxides

Projects in the Basin with emissions that exceed any of the mass daily emission thresholds in Table 4.3.A are considered significant by the SCAQMD.

Construction Emissions. Air quality impacts could occur during construction of the proposed Project due to soil disturbance and equipment exhaust. Major sources of emissions during grading, building construction and site work, building erection, paving and architectural coatings

include the following: (1) exhaust emissions from construction vehicles, (2) equipment and fugitive dust generated by vehicles and equipment traveling over exposed surfaces, and (3) sand disturbances from compacting and cement paving.

Construction of the proposed Project would include the following tasks: site preparation, grading, paving, building construction, and architectural coatings. The Project phasing would generally start with site preparation and grading on the Project site, and continue with the construction of the proposed Project. It is anticipated that construction activities would take approximately 14 to 16 months. Peak daily and annual emissions were analyzed using California Emission Estimator Model (CalEEMod Version 2016.3.1). Project-specific information provided by the Project Developer was used where available, including building details, construction schedule, materials, and earthwork requirements. Default construction equipment assumptions from CalEEMod were also used in the analysis. Grading activities on the site would involve the import of approximately 2,016 cy of fill. For the peak day analysis, it was assumed that approximately 42 two-way truck trips per day would deliver 294 cy of soil to the Project site. For the truck trip distance, a CalEEMod default value of 20 miles for each trip was applied in the analysis.

Fugitive dust emissions during Project construction would be substantially reduced by compliance with SCAQMD Rules 402 and 403 (Compliance Measure AQ-1) and idling restrictions (outlined in Compliance Measure AQ-2). Implementation of SCAQMD Rules 402 and 403, including measures such as on-site watering at least two times daily, is accounted for in the Project emissions estimates.

Table 4.3.B presents the peak daily construction emissions based on the CalEEMod emissions estimates. As shown by Table 4.3.B, construction equipment/vehicle emissions would not exceed any of the SCAQMD daily emissions thresholds. Therefore, construction air quality impacts would be less than significant, and no mitigation would be required.

Table 4.3.B: Peak Daily Construction Emissions (lbs/day)

Peak Construction Emissions	ROG	NO_X	CO	SO_2	PM_{10} (total)	$PM_{2.5}$ (total)
Site Preparation	1.8	19.5	8.3	0.0	3.4	2.1
Grading	1.7	25.0	9.0	0.0	3.5	2.0
Building Construction	2.6	18.5	16.5	0.0	1.6	1.1
Paving	1.0	8.5	9.4	0.0	0.6	0.4
Architectural Coatings	21.8	1.7	2.3	0.0	0.2	0.1
Highest Peak Daily Emissions	**21.8**	**25.0**	**16.5**	**0.0**	**3.5**	**2.1**
SCAQMD Construction Emissions Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Significance?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (November 2017) (provided in Appendix C).
CO = carbon monoxide
lbs/day = pounds per day
NOx = nitrous oxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide

Operational Emissions. Long-term air emission impacts are those impacts associated with any change in permanent use of the Project site by on-site stationary and off-site mobile sources that increase emissions. Stationary-source emissions include emissions associated with electricity consumption and natural gas usage. Mobile-source emissions are associated with vehicular trips associated with a project.[5]

Long-term operational emissions associated with the proposed Project are shown in Table 4.3.C. Adjustments were made to the CalEEMod modeling to account for Project compliance with the 2016 California Building Standards Code (California Code of Regulations, Title 24).

Table 4.3.C: Peak Daily Operational Emissions (lbs/day)

Source	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.5	0.0	0.0	0.0	0.0	0.0
Energy Sources	0.0	0.4	0.4	0.0	0.0	0.1
Mobile Sources	1.6	7.3	19.1	0.1	4.6	1.2
Total	**3.2**	**7.7**	**19.5**	**0.1**	**4.6**	**1.3**
SCAQMD Thresholds	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (November 2017) (provided in Appendix C).
CO = carbon monoxide
lbs/day = pounds per day
NOx = nitrous oxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_X = oxides of sulfur

As shown in Table 4.3.C, the Project-related increase in criteria pollutants would not exceed the corresponding SCAQMD daily emission thresholds for any of the criteria pollutants. Therefore, Project-related long-term air quality impacts would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result the generation of air quality emissions that would violate established standards. Therefore, the proposed textual amendments to the LUE would not generate any air quality emissions that could contribute to the violation of any air quality standards or contribute substantially to an existing or projected air quality violation, and no mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would generate air quality emissions. Future

[5] Based on the *Monrovia Towneplace Suites Traffic Impact Analysis* (LSA 2018; Appendix I), the Project would generate 891 total trips during Project operation.

individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required. However, please refer to Compliance Measure AQ-1.

Compliance Measure AQ-1 **Construction Emissions.** During construction activities, the Project shall comply with regional rules that assist in reducing short-term air pollutant emissions. The South Coast Air Quality Management District (SCAQMD) Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rules 403 and 402 are as follows:

- The Project Construction Contractor shall develop and implement dust-control methods that shall achieve this control level in a SCAQMD Rule 403 dust control plan, designate personnel to monitor the dust control program, and order increased watering, as necessary, to ensure a 55 percent control level. Those duties shall include holiday and weekend periods when work may not be in progress. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following:

    - Apply water twice daily, or nontoxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces or as needed to areas where soil is disturbed.

    - Use low-sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2.

    - During earthmoving or excavation operations, fugitive dust emissions shall be controlled by regular watering to prevent excessive amounts of dust, ceasing earthmoving and excavation activities during periods of

high winds (i.e., winds greater than 20 miles per hour [mph] averaged over 1 hour), and minimizing the area disturbed by earthmoving or excavation operations at all times.

- After earthmoving or excavation operations, fugitive dust emissions shall be controlled by revegetating and watering portions of the construction area to remain inactive longer than a period of 3 months and watering all active portions of the construction site.

- At all times, fugitive dust emissions shall be controlled by limiting the on-site vehicle speed to 15 miles per hour (mph) and paving road improvements as soon as feasible.

- At all times during the construction phase, ozone precursor emissions from mobile equipment shall be controlled by maintaining equipment engines in good condition and in proper tune according to manufacturers' specifications.

- Outdoor storage piles of construction materials shall be kept covered, watered, or otherwise chemically stabilized with a chemical wetting agent to minimize fugitive dust emissions and wind erosion.

Compliance Measure AQ-2 **Idling Restrictions**. During construction activities, the Project shall comply with Mitigation Measure AIR-C of the *City of Monrovia General Plan Proposed Land Use and Circulations Elements Environmental Impact Report (2008)* to reduce to reduce diesel engine emissions of ozone (O_3) precursors, reactive organic gases (ROGs) and nitrogen oxides (NO_X), particulate matter less than 10 microns in size (PM_{10}), particulate matter less than 2.5 microns in size ($PM_{2.5}$), and diesel particulate matter (PM).

- Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 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 manufacturers' recommended operating temperature;
- When the ambient temperature is below 40 degrees Fahrenheit (°F) or above 85°F; or
- When equipment is being repaired.

(c) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Hotel Development. The South Coast Air Basin is nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is nonattainment for the State PM_{10} standard, and in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards. As discussed in Response 4.3(b) above, no exceedance of SCAQMD criteria pollutant emission thresholds would be anticipated for construction and operation of the proposed Project. The projected emissions of criteria pollutants as a result of the proposed Project are calculated to be below the emissions thresholds established for the region, and therefore would not be cumulatively considerable. This conclusion is consistent with the methodology and guidance In provided by the SCAQMD in the *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (SCAQMD 2003)*, which states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Furthermore, while the proposed Project includes a General Plan Amendment (GPA) to modify the land use designation of the Project site from Business Enterprise (BE) to Office/Research and Development/Light Manufacturing (ORDLM), the general plan growth projections (i.e., residences and employees) for the Project site would not change or alter the growth forecast intensity used in the South Coast Air Quality Management Plan (AQMP). Hotel patrons are not utilized in the AQMP growth forecast model. Therefore, the GPA for the proposed Project would have a negligible effect on the general plan growth projections for the cumulative considerable analysis.

For the reasons described further above, there would be no cumulatively considerable net increase of the criteria pollutants that are in nonattainment status in the Basin. Impacts would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result the generation of air quality emissions that would increase criteria pollutants that are in nonattainment status in the Basin. Therefore, the proposed textual amendments to the LUE would not generate air quality emissions that could result in a cumulatively considerable net increase of criteria pollutants that are in nonattainment status in the Basin, and no mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in air quality emissions. However, future individual projects resulting from approval of the proposed GPA would be required to comply with Mitigation Measures AIR-A through AIR-C and Mitigation Measure AIR-E in the City's General Plan Land Use and Circulation Elements EIR. Specifically, these measures require that applicants analyze construction air quality impacts and local CO hot-spots associated with new development projects, prepare plans for reducing NO_x emissions (if required), and adhere to vehicular idling restrictions. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in a cumulatively considerable net increase of the criteria pollutants that are in nonattainment status in the Basin, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Hotel Development. As described in Response 4.3(b), the proposed Project would not significantly increase long-term emissions within the Project vicinity. Project implementation may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, Construction Contractors would be required to implement measures to reduce or eliminate emissions by following the SCAQMD's standard construction practices (Rules 402 and 403). Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Some of the applicable dust suppression techniques from Rule 403 are summarized below:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
- All trucks hauling demolished material, dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 ft. of freeboard in accordance with the requirements of California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).

SCAQMD has issued guidance on applying CalEEMod results to localized impacts analyses.[6] Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. Table 4.3.D shows that the construction emission rates would not exceed the localized significance thresholds (LSTs) for the nearest sensitive receptors in the Project vicinity.

Table 4.3.D: Construction Localized Emissions (lbs/day)

Emissions Sources	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	19.0	13.0	3.3	2.1
LST[1]	**89.0**	**623.0**	**4.0**	**3.0**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (November 2017) (provided in Appendix C).
Note: Source Receptor Area – East San Gabriel Valley, 1 acre, receptors at 25 meters.
[1] From the use of one grader and one rubber-tired dozer during the grading phase.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NOx = nitrous oxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

Table 4.3.E shows that the operational emission rates would not exceed the LSTs for sensitive receptors in the Project vicinity. Therefore, the operation activities associated with the proposed Project would not result in a locally significant air quality impact.

Table 4.3.E: Operational Localized Emissions (lbs/day)

Emissions Sources	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	0.4	1.0	0.2	0.1
LST	**89.0**	**623.0**	**2.0**	**1.0**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (November 2017) (Appendix C).
Note: Source Receptor Area – East San Gabriel Valley, 1 acre, receptors at 25 meters.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NOx = nitrous oxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

[6] South Coast Air Quality Management District (SCAQMD). Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed October 2017).

The Project's on-site emissions would be below the SCAQMD's localized significance thresholds for construction and operation. Therefore, sensitive receptors would not be expected to be exposed to substantial pollutant concentrations during construction and operations of the proposed Project. Therefore, Project-related air quality impacts on sensitive receptors would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result the exposure of sensitive receptors to air pollutants. Therefore, the proposed textual amendments to the LUE would not generate air quality emissions that could result in the exposure of sensitive receptors to substantial pollutant concentrations, and no mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements. However, future individual projects resulting from approval of the proposed GPA would be required to comply with Mitigation Measures AIR-A through AIR-C and Mitigation Measure AIR-E in the City's General Plan Land Use and Circulation Elements EIR. Specifically, these measures require that applicants analyze construction air quality impacts and local CO hot-spots associated with new development projects, prepare plans for reducing NO_x emissions (if required), and adhere to vehicular idling restrictions. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to sensitive receptors being exposed to substantial pollutant concentrations, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(e) Would the Project create objectionable odors affecting a substantial number of people?

Hotel Development. SCAQMD's *CEQA Air Quality Handbook* (SCAQMD 1993) identifies various secondary significance criteria related to odorous air contaminants. Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills, or heavy manufacturing uses. Pursuant to SCAQMD Rule 402, these sources shall include a quantitative assessment of potential odors and meteorological conditions. The Project does not propose any such uses or activities that would result in potentially significant odor impacts. Some objectionable odors may emanate from the operation of diesel-powered construction equipment during construction of the proposed Project. However, these odors would be limited to the construction period and would disperse quickly; therefore, these odors would not be considered a significant impact.

The proposed Project is a hotel project, which does not typically produce objectionable odors. On-site trash receptacles would have the potential to create adverse odors; however, trash receptacles would be located and maintained in a manner that would promote odor control to reduce potential odor impacts and would be removed from the site at least once per week. Therefore, adherence with applicable provisions in Compliance Measure AQ-2 would further ensure that no significant impacts related to objectionable odors would result from the proposed Project, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result the generation of objectionable odors. Therefore, the proposed textual amendments to the LUE would not result in the exposure of a substantial number of people to objectionable odors, and no mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements. However, future individual projects resulting from approval from the proposed GPA would be required to comply with Section 8.10.30 of the City's Municipal Code, which itself requires that every person in control of the day-to-day operations at any commercial premise provide for the collection and proper disposal of solid waste at least once per week to reduce potential odors associated with on-site trash receptacles. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to odors, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required. However, refer to Compliance Measure AQ-3, below.

Compliance Measure AQ-3 **Odors.** Throughout operation of the proposed Project, the Director of the City of Monrovia (City) Community Development Department, or designee, shall ensure that the Project complies with applicable provisions of Section 8.10.30 of the City's Municipal Code, which requires that every person in control of the day-to-day operations at any commercial premise provide for the collection and proper disposal of solid waste at least once per week.

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 Wildlife 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 Wildlife or U.S. 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?	☐	☐	☐	☒

Impact Analysis:

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

Hotel Development. The Project site is located within an urban area of the City of Monrovia. In its existing condition, the property is largely characterized by an undeveloped dirt lot. There are no known sensitive species or habitats on site as identified on local/regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS). Conversion of the area of the Project site proposed for development of the hotel from a vacant lot to a hotel use would result in the addition of on-site ornamental trees and shrubbery that could potentially support limited levels of wildlife. Therefore, impacts to such species are considered less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse effects to biological resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects, 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 CDFW or USFWS. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts to candidate, sensitive, or special-status species. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial adverse effects, 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 CDFW or USFWS, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. The Project site consists of heavily disturbed soil associated with previous development on the site. There is no riparian habitat or sensitive natural communities, as identified in local or regional plans, policies, or regulations or by the CDFW or USFWS, on the Project site. Therefore, development of the proposed Project is not anticipated to have an impact on any riparian habitat or other sensitive natural community, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse effects to biological resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in adverse impacts to any riparian habitat or sensitive natural communities. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project 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?

Hotel Development. The Project site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. Furthermore, because the Project site has been significantly altered due to past development activities on the site, the property is devoid of natural habitat and sensitive species. Therefore, development of the Project site would have no impact on federally protected wetlands, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse effects to federally protected wetlands. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects to any federally protected wetlands as defined by the Clean Water Act, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could impact federally protected wetlands as defined by Section 404 of the Clean Water Act. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts to any federally protected wetlands as defined by the Clean Water Act, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. The Project site is located in an urbanized are of the City that is developed with office, commercial, industrial, and residential uses. Within the vicinity of the Project site, there are no large areas of natural habitat that would facilitate wildlife movement to serve as a wildlife corridor. Species that are found on the site either fly onto the site or are able to navigate on the ground through long stretches of urban development. Therefore, the Project site does not contain any native resident or migratory fish, wildlife species, or wildlife corridors. In addition, no portion of the Project site or the immediately surrounding areas contains an open body of water that serves as natural habitat in which fish could exist.

While there is no landscaping on the site, the Taco Bell property abutting the western portion of the site includes existing trees along the southern perimeter of the property that may provide suitable habitat for nesting migratory birds. Although the Project does not include any activities on the property west of the site, the proposed Project has the potential to disturb active bird nests if construction activities occur in close proximity to the nests. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Game Code. Therefore, implementation of the proposed Project would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests. Project implementation must be accomplished in a manner that avoids impacts to active nests during the breeding season. Therefore, if Project construction occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to ground- and/or vegetation-disturbing activities to confirm the absence of nesting birds. As documented in Mitigation Measure BIO-1, avoidance of impacts can be accomplished through a variety of means, including establishing suitable buffers around any active nests. With implementation of Mitigation Measure BIO-1, impacts to nesting birds would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse effects to migratory species or wildlife corridors. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects related to the interference 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. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would

not include any physical improvements that could impact the movement of any migratory species. However, future individual projects resulting from approval of the proposed GPA would be required to install ornamental landscaping and trees, as required by Urban Design Guidelines of the City's General Plan Land Use Element. Installation of new landscaping associated with future development projects would serve to provide additional potential habitat for migratory bird species. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the interference 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. No mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

BIO-1 **Migratory Bird Treaty Act.** In the event that construction activities should commence between February 1 and September 15, the Developer (or its contractor) shall retain a qualified biologist (i.e., a professional biologist that is familiar with local birds and their nesting behaviors) to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. The nesting survey shall include the Project site and areas immediately adjacent to the site that could potentially be affected by Project-related construction activities such as noise, human activity, and dust, etc. If active nesting of birds is observed within 100 feet (ft.) of the designated construction area prior to construction, the biologist shall establish suitable buffers around the active nests (e.g., as much as 500 ft. for raptors and 300 ft. for nonraptors [subject to the recommendations of the qualified biologist]), and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Prior to commencement of grading activities, the Director of the City of Monrovia Community Development Department, or designee, shall verify that all Project grading and construction plans are consistent with the requirements stated above, that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field with orange snow fencing.

Significance Determination after Mitigation: Less Than Significant

(e) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Hotel Development. The City of Monrovia adopted an Oak Tree Preservation Plan in 1987 (incorporated into Section 17.20.040 of the City of Monrovia Municipal Code). Although the

proposed Project would include the provision of ornamental trees throughout the area of the Project site proposed for development of the hotel, there are no trees currently present on this portion of the site. Therefore, the proposed Project would not result in any impact related to local policies or ordinances protecting biological resources, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in conflicts with local policies or ordinances protecting biological resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse effects related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could conflict with local policies or ordinances protecting biological resources. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines,* as well as the City's Oak Tree Preservation Plan. Therefore, the proposed GPA would not result in impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. The City, including the area of the Project site and surrounding areas are not located within the boundaries of a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other local or regional conservation plan. Therefore, implementation of the proposed Project would not result in any impacts to an HCP or NCCP, or other approved local, regional, or State HCP, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in conflicts with an adopted HCP, NCCP, or State HCP, and no mitigation would be required.

As previously stated, the City of Monrovia is not located within an area covered by an HCP, NCCP, or any other local or regional conservation plan. Therefore, future projects resulting from approval of the proposed GPA would not result in impacts related to conflicts with any HCP, NCCP, or other approved local, regional, or State HCP, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.5 CULTURAL RESOURCES.

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?	☐	☒	☐	☐

Discussion:

The discussion and analysis provided in this section is based on the *Paleontological Analysis of the Monrovia Marriot Project, City of Monrovia, County of Los Angeles, California* (Paleontological Analysis) (LSA, December 2016) and the *Results of the Cultural Resources Assessment of the 1.71-acre Monrovia TownePlace Suites Project, City of Monrovia, Los Angeles County*, California (Archaeological Resources Assessment) (LSA, October 2017) (provided in Appendix D).

Impact Analysis:

(a) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Hotel Development. In its existing setting, the Project site is vacant and undeveloped.

On August 29, 2017, a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within 0.25 mile of the Project site was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System at California State University, Fullerton. The SCCIC houses the pertinent archaeological and historic site and survey information necessary to determine whether cultural resources are known to exist on the Project site and within the Project vicinity. The records search included a review of all recorded historic and prehistoric archaeological sites within the 0.25 mile radius of the Project site, as well as a review of known cultural resource survey and excavation reports. The National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), California Historical Landmarks, California Points of Historical Interest, and the California Historic Resources Inventory (HRI) were also examined.

The records search showed that three studies have been conducted within 0.25 mile of the Project site. The records search revealed that the Project site had never been previously surveyed and that the Project site contains no previously recorded prehistoric resources. Four cultural resources, all of which include historic buildings (P-19-187710, P-19-187711, P-19-187712, and P-19-192435), were previously recorded within 0.25 mile of the current Project site.

The HRI did not identify any properties in the Project site, but did identify five listed properties within 0.25 mile of the Project site. Of the five listed historic properties, four are listed with a 6Y status and one is listed with a 6U status. A 6Y status applies when the property has been determined to be ineligible for the National Register by consensus through the Section 106 process and has not yet been evaluated for the California Register or the Local Listing. A 6U status applies when the property has been determined to be ineligible for the National Register pursuant to the Section 106 process, but that determination has not been reviewed by the State Historic Preservation Officer.

The records search also provided three historic maps of the area, which indicated that development within 0.25 mile of the Project site has occurred as early as 1894. Furthermore, according to a review of historic aerial photographs (including those incorporated in the Phase I Environmental Site Assessment prepared for the Project), the site was first developed between 1928 and 1938 with a gasoline service station and a residential structure. Sometime between 2005 and 2009, the buildings in the eastern portion of the Project site were torn down and that portion of the Project site became a vacant lot. The eastern portion of the lot has remained vacant since that time.

Furthermore, according to the Los Angeles County Map of Historic Resources and the City of Monrovia (City) maps of locally-designated Historic Landmarks[7] and Historic Districts,[8] there are no historic resources on or within the vicinity of the Project site that would be impacted by the Project. Therefore, the proposed Project would not result in any impacts related to historical resources, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts to historical resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse changes in the significance of historical resources as defined in §15064.5, and no mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could affect historic resources. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to historical resources, and no mitigation would be required.

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7 City of Monrovia. Historic Landmarks in Monrovia. April 3, 2013. Website: https://get.google.com/albumarchive/117910731885277619054/album/AF1QipP89PrYqnGF1ORC-hoyCv91f3yeFF6MAkwxyH39?source=pwa (accessed August 29, 2017).

8 City of Monrovia. Historic Preservation in Monrovia. Website: http://www.cityofmonrovia.org/discover-monrovia/historic-preservation (accessed August 29, 2017).

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Hotel Development. As described further in Response 4.5(a), a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within 0.25 mile of the Project site was conducted at the SCCIC of the California Historical Resources Information System at California State University, Fullerton. The records search showed that three studies have been conducted within 0.25 mile of the Project site, none of which included any part of the Project site itself. The records search revealed that the Project site had never been previously surveyed and that the Project site contains no previously recorded prehistoric resources. Four cultural resources, all of which include historic buildings were previously recorded within 0.25 mile of the current Project site.

On September 7, 2017, LSA archaeologist Kerrie Collison conducted a pedestrian survey of the Project site. Ground visibility during this survey was nearly 100 percent, with some pea gravel and wood chips present. Where the ground was not covered, the soil was a medium or dark brown, which was examined for evidence of midden deposit, but none was observed. It is possible that dark brown soil on the site is the result of decomposing woodchips. Scattered modern trash was noted throughout the site, and temporary power poles and a dumpster were also observed in the Project site. The terrain of the site was noted as being mostly flat with a downslope near the southern boundary.

The Archaeological Resources Assessment concluded that due to historic development on the Project site occurring as early as 1894, there is potential for subsurface archaeological deposits below the Artificial Fill on the site (occurring to a depth of 7 ft. below ground surface [bgs]) in the Young Alluvial Fan Deposits to a depth of approximately 10 ft. Consequently, Mitigation Measure CUL-1 requires that an archaeological monitor be on site during ground-disturbing activities to monitor for buried prehistoric or historic material when excavation occurs in previously undisturbed native soil (i.e., Young Alluvial Fan Deposits) from a depth of approximately 7 ft. bgs to 10 ft. bgs. Monitoring would not be necessary when excavation occurs in Artificial Fill. Implementation of Mitigation Measure CUL-1 would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

At the completion of Project construction, the proposed Project would not result in further disturbance of native soils on the Project site. Therefore, operation of the proposed Project would not result in a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the *State CEQA Guidelines*. No mitigation would be required

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE.

These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts to archaeological resources. Therefore, the proposed textual amendments to the LUE would not result in substantial adverse changes in the significance of archaeological resources pursuant to §15064.5, and no mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could affect archaeological resources. However, future individual projects facilitated by approval of the proposed GPA would be required to comply with Mitigation Measure CUL-A in the City's General Plan Land Use and Circulation Elements EIR, which itself requires site-specific assessments to identify archaeological resources on sites proposed for development that would involve substantial grading or earthmoving activities. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to historical resources, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measure:

CUL-1 **Archaeological Monitors.** Prior to the issuance of a grading permit, the Developer shall submit proof to the Director of the City of Monrovia (City) Community Development Department, or designee, that a qualified archaeologist has been retained to provide professional archaeological monitoring services for any construction activities that may disturb native soils (i.e., Young Alluvial Fan Deposits) from approximately 7 feet (ft.) below ground surface (bgs) to a depth of 10 ft. bgs. The monitor shall be present at the pre-grading conference to explain the cultural monitoring requirements associated with the proposed Project. If any significant historical resources or archaeological resources are encountered during monitoring, work shall stop within the immediate vicinity of the resource, with the precise area to be determined by the monitor, until such time as the resource can be evaluated by an archaeologist and any other appropriate individuals. Project personnel shall not collect or move any archaeological materials and associated materials. To the extent feasible, Project activities shall avoid these resources. Where avoidance is not feasible, the archaeological resources shall be evaluated for their eligibility for listing in the California Register of Historical Resources. If the resources are not eligible, avoidance is not necessary. If the resources are eligible, adverse effects on the resources must be avoided, or such effects must be mitigated. Mitigation can include, but is not necessarily limited to: excavation of the deposit in accordance with a data recovery plan, per California Code of Regulations (CCR) Title 4(3) Section 5126.4(b)(3)(C) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; production of a report detailing the methods, findings, and significance of the archaeological

site and associated materials; curation of archaeological materials at an appropriate facility for future research and/or display; an interpretive display of recovered archaeological materials at a local school, museum, or library; and public lectures at local schools and/or historical societies on the findings and significance of the site and recovered archaeological materials.

Significance Determination after Mitigation: Less Than Significant

(c) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Hotel Development. As part of the Paleontological Analysis prepared for the proposed Project, LSA examined geologic maps of the Project site and reviewed relevant geological and paleontological literature to determine which geologic units are present within the Project site and whether fossils have been recovered within the Project site or from similar geologic units elsewhere in the region. A search for known fossil localities was also conducted through the Natural History Museum of Los Angeles County (LACM) in order to determine the status and extent of previously recorded paleontological resources within and surrounding the Project site.

Results of the literature review indicate that the Project site is located at the northern end of the Peninsular Ranges Geomorphic Province, a 900-mile-long northwest-southeast-trending structural block that extends from the Transverse Ranges in the north to the tip of Baja California in the south and includes the Los Angeles Basin.

Geologic mapping of the property indicates that the Project site contains Holocene to late Pleistocene in age (less than 126,000 years ago) Young Alluvial Fan Deposits. In addition, the Geotechnical Investigation for the Project indicates that the Project site is underlain by 7 ft. of Artificial Fill. Artificial Fill consists of sediments that have been removed from one location and transported to another location and, therefore, have no paleontological sensitivity. Young Alluvial Fan Deposits are Holocene to late Pleistocene in age (less than 126,000 years ago) and consist of unconsolidated silt, sand, and gravel. Cobble- and boulder-size clasts are also present and are more abundant closer to the hills and mountains. Although Holocene (less than 11,700 years ago) deposits can contain remains of plants and animals, only those from the middle to early Holocene (4,200 to 11,700 years ago) are considered scientifically important. Moreover, scientifically important fossils from middle to early Holocene deposits are not very common. However, the older Pleistocene deposits that may be reached below a depth of approximately 10 ft. have produced scientifically important fossils elsewhere in the County and region. As such, there is a potential to encounter scientifically important resources in the older sediments of this geologic unit at a depth of approximately 10 ft. Therefore, these deposits have a low paleontological sensitivity above 10 ft. and a high sensitivity below that mark.

According to the locality search conducted by the LACM, there are no known fossil localities on the Project site. The locality search also confirmed that the Project site is underlain by Young Alluvial Fan Deposits with older Quaternary sediments with possibly occurring at relatively shallow depths. The closest vertebrae fossil locality in these older Quaternary deposits is LACM

342, which is west of the Project site in the City of Eagle Rock. This locality produced a fossil specimen of turkey and mammoth 14 ft. below the surface.

Based on the findings of the Fossil Locality Search, LACM believes the shallow excavations in the younger Quaternary alluvial deposits on the Project site are unlikely to recover any scientifically significant vertebrate remains.

The potential for paleontological resources on the Project site is considered low because the site contains Artificial Fill (which has no paleontological sensitivity) and Young Alluvial Fan Deposits (which have low paleontological sensitivity from the surface to a depth of 10 ft. and a high sensitivity below that mark). Ground-disturbing activities on the site are anticipated to extend to a maximum depth of 10 ft. In the unlikely event that fossil remains are encountered on the site, a paleontologist shall be contacted to assess the discovery for scientific significance and to make recommendations regarding the necessity to develop paleontological mitigation (including paleontological monitoring, collection, stabilization, and identification of observed resources; curation of resources into a museum repository; and preparation of a monitoring report of findings), as required by Mitigation Measure CUL-2. With implementation of Mitigation Measure CUL-2, impacts would be reduced to a less than significant level.

At the completion of Project construction, the proposed Project would not result in further disturbance of native soils on the Project site. Therefore, operation of the proposed Project would not result in a substantial adverse change in the significance of a paleontological resource as defined in Section 15064.5 of the *State CEQA Guidelines,* and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts to paleontological resources. Therefore, the proposed textual amendments to the LUE would not result directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could affect paleontological resources. However, future individual projects facilitated by approval of the proposed GPA would be required to comply with Mitigation Measure CUL-A in the City's General Plan Land Use and Circulation Elements EIR, which itself requires site-specific assessments to identify paleontological resources on sites proposed for development that would involve substantial grading or earthmoving activities. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to paleontological resources, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measure:

CUL-2 **Unknown Paleontological Resources.** In the event that paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 ft. of the find until a qualified paleontologist (i.e., a practicing paleontologist that is recognized in the paleontological community, is proficient in vertebrate paleontology, and is approved by the Director of the City Community Development Department, or designee) has evaluated the find in accordance with federal, State, and local guidelines. Personnel of the proposed Project shall not collect or move any paleontological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. If any fossil remains are discovered in sediments with a Low paleontological sensitivity rating (Young Alluvial Fan Deposits), the paleontologist shall make recommendations as to whether monitoring shall be required in these sediments on a full-time basis. Prior to commencement of grading activities, the Director of the City Community Development Department, or designee, shall verify that all Project grading and construction plans specify federal, State, and local requirements related to the unanticipated discovery of paleontological resources as stated above.

Significance Determination after Mitigation: Less Than Significant

(d) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Hotel Development. No human remains are known to be present on the Project site, and there are no facts or evidence to support the idea that Native Americans or people of European descent are buried on the Project site. However, as described previously, buried and undiscovered archaeological remains, including human remains, may be present below ground surface in portions of the Project site. Disturbing human remains could violate the State's Health and Safety Code, as well as destroy the resource. In the unlikely event that human remains are encountered during Project grading, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to. Construction contractors are required to adhere to California Code of Regulations (CCR) Section 15064.5(e), Public Resources Code (PRC) Section 5097, and Section 7050.5 of the State's Health and Safety Code. To ensure proper treatment of burials, in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, the law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the Los Angeles County Coroner of the find. The contractor, the Developer, and the Los Angeles County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State's Health and Safety Code. Compliance with these provisions (specified in Mitigation Measure CUL-3), would ensure that any potential impacts to unknown buried human remains

would be less than significant by ensuring appropriate examination, treatment, and protection of human remains as required by State law.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in impacts associated with the disturbance of human remains. Therefore, the proposed textual amendments to the LUE would not result in the disturbance of human remains, including those interred outside of formal cemeteries, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could disturb human remains. However, future projects facilitated by approval of the proposed GPA would be required to comply with applicable State and local regulations pertaining to the accidental discovery of unknown human remains during construction activities. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the disturbance of human remains, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measure:

CUL-3 **Human Remains.** In the event that human remains are encountered on the Project site, work within 50 ft. of the discovery shall be redirected and the Los Angeles County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code (HSC) Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the Los Angeles County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Consistent with CCR Section 15064.5(d), if the

remains are determined to be Native American and an MLD is notified, the City shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, Director of the City Community Development Department, or its designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State HSC Section 7050.5, and PRC Section 5097.98, as stated above.

Significance Determination after Mitigation: Less Than Significant

4.6 GEOLOGY AND SOILS.

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 (1994), creating substantial risks to life or property?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Discussion:

The following section is based on the *Geological Engineering Investigation for the Proposed TownePlace Suites Hotel E. Huntington Drive & S. Myrtle Avenue, Monrovia, California* (Geotechnical Investigation) conducted by Salem Engineering Group, Inc. (September 30, 2016) (provided in Appendix E).

Impact Analysis:

(a) Would the Project 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.

Hotel Development. As with all of Southern California, the Project site is located in an area subject to strong ground motion resulting from earthquakes on nearby faults. However, according to the Geotechnical Investigation prepared for the proposed Project, the Project site is not located within an established Alquist-Priolo Earthquake Fault Zone for surface fault ruptures. In addition, there are no known active faults or fault traces with the potential for surface fault rupture crossing the Project site. The closest faults to the Project site are

associated with the Raymond fault system, which itself is located approximately 1.4 miles from the site. Therefore, impacts related to the rupture of a known earthquake fault as depicted on the most recent Alquist-Priolo Earthquake Fault Zoning Map are anticipated to be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with the rupture of a known earthquake fault. Therefore, the proposed textual amendments to the LUE would not result the exposure of people or structures to substantial adverse impacts related to the rupture of a known earthquake fault, as depicted on the most recent Alquist-Priolo Earthquake Fault Zoning Map. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include physical improvements that would be subject to impacts as a result of surface fault rupture. Further, future individual projects resulting from the approval of the proposed LUE would be required to comply with requirements established in the City's General Plan Safety Element (2002) pertaining to seismic safety and would also be subject to separate environmental review on a project-specific basis in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts to the rupture of a known earthquake fault as depicted on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(a) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(ii) Strong seismic ground shaking?

Hotel Development. As previously stated, the Project site is located in an active seismic region and could be subject to strong ground motion resulting from earthquakes. Ground shaking resulting from earthquakes associated with both nearby and more distant faults may result in the generation of moderate to strong shaking at the Project site. Damage to development and infrastructure associated with the surrounding areas could be expected as a result of significant ground shaking during a strong seismic event in the region. Mitigation Measure GEO-1, requires that the Project Developer comply with the recommendations of the Geotechnical Investigation, the most current California Building Code (CBC), and the City Building Code, which stipulates appropriate seismic design provisions that shall be implemented with Project design and

construction. With implementation of Mitigation Measure GEO-1, potential Project impacts related to strong seismic ground shaking would be reduced to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with the strong seismic ground shaking. Therefore, the proposed textual amendments to the LUE would not result the exposure of people or structures to substantial adverse impacts related to strong seismic ground shaking, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would be adversely impacted by strong seismic ground shaking. Future individual projects resulting from the approval of the proposed LUE would be required to comply with requirements established in the City's General Plan Safety Element (2002) pertaining to seismic safety and would also be subject to separate environmental review on a project-specific basis in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to strong seismic ground shaking, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measure:

GEO-1 **Incorporation of and Compliance with the Recommendations in the Geotechnical Study.** All grading operations and construction shall be conducted in conformance with the recommendations included in the *Geological Engineering Investigation for the Proposed TownePlace Suites Hotel E. Huntington Drive & S. Myrtle Avenue, Monrovia, California* (Geotechnical Investigation) conducted by Salem Engineering Group, Inc. (September 30, 2016)(provided in Appendix E), as approved by the City of Monrovia (City) Engineer. Design, grading, and construction shall be performed in accordance with the requirements of the City Building Code and the California Building Code (CBC) applicable at the time of grading. The final Geotechnical Investigation shall present the results of observation and testing done during grading activities. Recommendations found in the geotechnical document address topics including, but not limited to, the following:

- Earthwork, including site preparation (e.g., grading), soil replacement, compaction standards, groundwater seepage, and fill placement;
- Foundations, including design recommendations and parameters;
- Soil excavations;
- Seismic design parameters;

- Retaining wall design and construction criteria including backfill requirements;
- Concrete flatwork, including exterior slabs, and design of these features;
- Underground utility trenches;
- Surface drainage;
- Pavement design;
- Soil corrosion; and
- Post-construction considerations, including drainage.

Additional site grading, foundation, and utility plans shall be reviewed by the Project Geotechnical Consultant prior to construction to check for conformance with the recommendations of this report. The Project Geotechnical Consultant shall be present during site grading and foundation construction to observe and document proper implementation of the geotechnical recommendations. The City of Monrovia (City) shall require the Project Geotechnical Consultant to perform at least the following duties during construction:

- Observe earthwork and test compacted fill to ensure soils are suitable for re-use as engineered fill.
- Observe and test imported fill prior to bringing soil to the site.
- Observe and test the bottom of removals to check that the recommendations presented in the Geotechnical Investigation are incorporated during site grading, construction of Project improvements, and excavation of foundations.
- Observe all trench and foundation excavation bottoms prior to placing bedding sands, fill, steel, gravel, or concrete.
- Observe foundation excavations prior to the placement of reinforcing steel and concrete to verify that excavations and exposed soil conditions are consistent with those anticipated. If unanticipated soil conditions are encountered, foundation modifications may be required.

Significance Determination with Mitigation Incorporated: Less Than Significant

(a) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(iii) Seismic-related ground failure, including liquefaction?

Hotel Development. Liquefaction commonly occurs when three conditions are present simultaneously: (1) high groundwater; (2) relatively loose, cohesionless (sandy) soil; and (3) earthquake-generated seismic waves. The presence of these conditions may cause a loss of shear strength and, in many cases, ground settlement. According to the Geotechnical Investigation (Appendix E) prepared for the Project, the Project site is not located within a

potential liquefaction zone. Therefore, no impacts with respect to liquefaction are anticipated, and no mitigation would be required.

Loss of Bearing. Liquefaction can potentially cause foundation-bearing failure due to ground softening and near failure in bearing. Based on the depth of the groundwater (i.e., estimated to be at a depth of more than 50 feet [ft.] below ground surface [bgs]) and the requirements for the removal of unsuitable soils (i.e., undocumented artificial fill), the potential for loss of bearing would be minimal. Therefore, no impacts related to the loss of bearing due to liquefaction are anticipated, and no mitigation would be required.

Lateral Spreading. The lateral displacement of surficial blocks of sediment can occur as a result of liquefaction in a subsurface layer. The most pervasive forms of lateral spreading typically involve sites located near a "free-face" (e.g., large slopes and channels); however, lateral spreading can occur on sites with gently sloping (1 percent or more) ground (e.g., the subject site). Determination of the potential for lateral spread is based on the presence of continuous potentially liquefiable soil layers underneath the structures, the presence of lateral confinement, and various analyses (e.g., empirical modeling). Surface manifestation of lateral spread is typically limited to sites with liquefiable soils within 10 meters (32 ft.) of grade. According to the Geotechnical Investigation prepared for the Project, the potential for lateral spread to occur on site is considered low and within design tolerances of the proposed foundation systems. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with seismic-related ground failure. Therefore, the proposed textual amendments to the LUE would not result the exposure of people or structures to substantial adverse impacts related to seismic related ground failure, including liquefaction. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in impacts with respect to liquefaction. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis and would also be required to comply with requirements established in the City's General Plan Safety Element (2002), in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to liquefaction, and no mitigation would be required.

Significance Determination: No Significant Impact

Mitigation Measure: No mitigation is required.

(a) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(iv) Landslides?

Hotel Development. Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes in areas with significant ground slopes. The topography at the existing Project site and within the surrounding area is relatively flat. According to the City's General Plan Safety Element (2002) and the Geotechnical Investigation prepared for the Project, the Project is not within an earthquake-induced landslide zone and is not located within an area subject to potential seismic slope instability. Therefore, seismically induced landslides are unlikely to occur at the site, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with landslides. Therefore, the proposed textual amendments to the LUE would not result the exposure of people or structures to substantial adverse impacts related to landslide, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would be subjected to adverse impacts in the event of a landslide. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis and would be required to comply with provisions in the City's General Plan Safety Element (2002), in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts with respect to landslides, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project result in substantial soil erosion or the loss of topsoil?

Hotel Development. During construction of the proposed Project, soil would be exposed and there would be increased potential for soil erosion and siltation compared to existing conditions. During storm events, erosion and siltation could occur at an accelerated rate. The increased erosion potential could result in short-term water quality impacts as discussed in Section 4.9, Hydrology and Water Quality. As discussed in Mitigation Measures WQ-1 and WQ-2 in Section 4.9, the proposed Project would comply with the Construction General Permit and the City of Monrovia MS4 Permit, which require preparation of a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan and implementation of construction best management practices (BMPs) to reduce impacts to water quality during construction, including impacts associated with soil erosion and siltation. With incorporation of construction

BMPs as required by Mitigation Measures WQ-1 and WQ-2, impacts related to erosion during construction would be reduced to a less than significant level.

As discussed in further detail in Section 4.9, 1.39 acres of the site would be impervious surface areas and not prone to erosion or siltation in the proposed condition. The remaining portion of the site (0.32 acre) would primarily be landscaping, which would minimize on-site erosion and siltation. The proposed Project would increase impervious surface area on the Project site by approximately 1.39 acres, which would increase runoff peak flow and potentially increase off-site erosion. However, the Project would include an underground infiltration chamber that would capture stormwater runoff and retain any increase in flow on the site. With implementation of the underground infiltration chamber, the Project would not increase stormwater runoff from the Project site; therefore, increased off-site erosion would not occur. As specified in Mitigation Measure WQ-3, a detailed Final Hydrology and Hydraulic and Low Impact Development (LID) Report would be prepared for the Project to ensure that the on-site storm drain facilities (including the infiltration system) are appropriately sized to reduce stormwater runoff. Because the Project would not increase stormwater runoff from the Project site, and the Project site surfaces would not be prone to erosion, the Project site would not result in substantial soil erosion or the loss of topsoil during operation. Therefore, with incorporation of Mitigation Measure WQ-3, impacts related to erosion and loss of topsoil would be less than significant.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts with respect to substantial soil erosion or the loss of topsoil. Therefore, the proposed textual amendments to the LUE would not result impacts related to substantial soil erosion or the loss of topsoil, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements related to soil erosion. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to substantial soil erosion or the loss of topsoil, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures WQ-1 through WQ-3 in Section 4.9, Hydrology and Water Quality.

Significance Determination with Mitigation Incorporated: Less Than Significant

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

Hotel Development. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. Because the Project site is in a relatively flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the Project or the surrounding area. In addition, the site is not within a State-designated hazard zone for seismically induced landslides.

Although no indications of landslide activity or gross slope instability were observed at the Project site, grading activities during construction would produce temporary construction slope in some areas. Unstable cut-and-fill slopes could create significant short-term and long-term hazards both on and off site. All excavations must be performed in accordance with City and State Building Codes, and the Division of Occupational Safety and Health requirements. Temporary unsurcharged embankments, if required during excavations and earthwork on the site, would be no steeper than a 1:1 ratio. With implementation of the recommendations in the Project Geotechnical Investigation (as required in Mitigation Measure GEO-1), potential impacts related to slope instability would be reduced below a level of significance.

As discussed in Response 4.6(a)(iii), the Geotechnical Investigation prepared for the proposed Project determined that there is no potential for liquefiable soils to result in bearing capacity failures due to the loss of foundation support or vertical settlement and/or undergo lateral spreading. No mitigation would be required.

Subsidence, the sinking of the land surface due to oil, gas, and water production, causes loss of pore pressure as the weight of the overburden compacts the underlying sediments. No subsidence associated with fluid withdrawal is known to have occurred on or in the vicinity of the Project site.[9] Therefore, impacts related to subsidence would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with by unstable geologic unit or soil. Therefore, the proposed textual amendments to the LUE would not result impacts related to an unstable geologic unit or soil, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in potential impacts related to

[9] United States Geological Survey (USGS). Areas of Land Subsidence in California. Website: https://ca.water.usgs.gov/land_subsidence/ california-subsidence-areas.html (accessed September 13, 2017).

unstable soils. The parcels included within the Crossroads District are relatively flat; therefore, new development facilitated by approval of the proposed GPA would not result in hillside development that would be subject to unstable soils or collapse. However, future individual projects resulting from the approval of the proposed LUE would be required to comply with regulations outlined in Chapter 15.28 of the City's Municipal Code aimed at minimizing the risk of collapse and slope failure during construction activities. In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to unstable soils, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. Expansive soils contain types of clay minerals that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out. Soils with an expansion index of greater than 20 are classified as expansive for building purposes and, therefore, have a potentially significant impact. Based on laboratory testing in the Geotechnical Investigation, the soils on the Project site were classified to have "very low" expansion potential (0 = Expansion Index). Therefore, impacts related to expansive soils would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts associated with expansive soils. Therefore, the proposed textual amendments to the LUE would not result in impacts to life or property as a result of locating development on expansive soil, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements related to expansive soils. Future individual projects resulting from the approval of the proposed LUE would be subject to a separate Site Plan review process. As part of this process, the City would identify whether or not a grading permit is required for the project. If a grading permit is required, then a preliminary soil report shall be prepared for the project consistent with Section 15.28.070 of the City's Municipal Code. As specified in the City's Municipal Code, recommendations to prevent structural damage shall be identified if the preliminary soil report identifies expansive soils on a project site. Future

individual projects resulting from approval of the proposed GPA would also be subject to environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to expansive soils, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. The Project would be required by the City to connect to the public sewer system adjacent to the site. The Project does not include construction of or connections to septic tanks or alternative wastewater disposal systems. Therefore, the proposed Project would not result in impacts related to the soils capability to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the installation of septic tanks or alternative wastewater disposal systems. Therefore, the proposed textual amendments to the LUE would not result impacts related to the capability of the soils to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would trigger the need for septic tanks or any other wastewater disposal systems. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to the capability of the soils to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.7 GREENHOUSE GAS EMISSIONS.

Would the Project:

		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?	☐	☐	☒	☐

Technical Background:

Global climate change (GCC) describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide [CO_2], methane [CH_4], and nitrous dioxide [N_2O]) that capture heat radiated from the Earth's surface, which in turn warms the atmosphere. This natural phenomenon is known as the "greenhouse effect." That said, excessive human-generated greenhouse gas (GHG)[10] emissions can and are altering the global climate. The principal GHGs of concern contributing to the greenhouse effect are CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is the largest naturally occurring GHG; however, it is not identified as an anthropogenic constituent of concern.

The CEQA statutes, the California Office of Planning and Research (OPR) guidelines, and the draft proposed changes to the *State CEQA Guidelines* do not currently prescribe specific quantitative thresholds of significance or a particular methodology for conducting an impact analysis related to GHG effects on global climate. Rather, as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency.

Currently, there is no Statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Threshold methodology and thresholds are still being developed and revised by air districts in the State. Therefore, this environmental issue remains unsettled and must be evaluated on a case-by-case basis until the South Coast Air Quality Management District (SCAQMD) adopts significance thresholds and GHG emissions impact methodology. In the absence of a Climate Action Plan for Monrovia, SCAQMD thresholds, when adopted, would apply to future development in the City.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working

[10] The principal GHGs of concern contributing to the greenhouse effect are CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Water vapor is the largest naturally occurring GHG; however, it is not identified as an anthropogenic constituent of concern.

Group).[11] This Working Group proposed a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. In the absence of any further guidance from SCAQMD since this proposal in 2008, these draft interim proposed GHG emissions thresholds are used in this analysis. The applicable tier for this project is Tier 3; if GHG emissions are less than 3,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year (MT CO_2e/yr), project-level and cumulative GHG emissions are less than significant.

Individual GHGs have varying global warming potentials and atmospheric lifetimes. Because it is not possible to tie specific GHG emissions to actual changes in climate, this evaluation focuses on the project's emission of GHGs. CO_2e is a consistent methodology for comparing GHG emissions because it normalizes various GHGs to the same metric. GHG emissions are typically measured in terms of metric tons of "CO_2 equivalents" (CO_2e). Therefore, for the purpose of this technical analysis, the concept of CO_2e is used to describe how much global climate change a given type and amount of GHG may cause, using the functionally equivalent amount or concentration of CO_2 as the reference. The GHG emissions estimates were calculated using CalEEMod Version 2016.3.1.

Impact Analysis:

(a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Hotel Development. Construction and operation of the proposed Project would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during the Project's operations. Overall, the following activities associated with the proposed Project could directly or indirectly contribute to the generation of GHG emissions:

- **Construction Activities:** GHGs would be emitted through the operation of construction equipment and from worker and supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O.
- **Gas, Electricity and Water Use:** Natural Gas use results in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Approximately one-fifth of the electricity and one-third of the non-power plant natural gas consumed in the State are associated with water delivery, treatment, and use.[12]
- **Solid Waste Disposal:** Solid waste (e.g., green waste, trash from receptacles, and construction waste) generated by the project could contribute to GHG emissions in a variety

[11] South Coast Air Quality Management District (SCAQMD). *Greenhouse Gases (GHG) CEQA Significance Thresholds*. Website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds (accessed October 2017).

[12] California Air Resources Board (ARB). 2010. *Economic Sectors Portal*. Website: www.arb.ca.gov/cc/ghgsectors/ghgsectors.htm (accessed October 2017).

of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH_4 from the anaerobic decomposition of organic materials. CH_4 is 25 times more potent a GHG than CO_2. However, landfill methane (CH_4) can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.

- **Motor Vehicle Use:** Transportation associated with the Project would result in GHG emissions from the combustion of fossil fuels in daily automobile trips.

Construction GHG Emissions. GHG emissions associated with the Project would occur over the short term from construction activities, consisting primarily of emissions from equipment and vehicle exhaust. The calculation presented below includes construction emissions in terms of CO_2 and annual CO_2e GHG emissions from increased energy consumption, water usage, and solid waste disposal.

GHG emissions generated by the proposed Project would predominantly consist of CO_2. In comparison to criteria air pollutants such as O_3 and PM_{10}, CO_2 emissions persist in the atmosphere for a substantially longer period of time. While emissions of other GHGs, such as CH_4, are important with respect to GCC, emission levels of other GHGs are less dependent on the land use and circulation patterns associated with the proposed Project than are levels of CO_2.

Construction activities produce combustion emissions from various sources such as site preparation, earthwork, building erection, building construction, architectural coatings, on-site construction vehicles, equipment hauling materials to and from the site, and motor vehicles transporting the construction crew. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. Table 4.7.A presents the annual construction emissions based on the CalEEMod emissions estimates.

Table 4.7.A: Project Construction Greenhouse Gas Emissions

Emissions	Pollutant Emissions (MT/yr)			
	CO_2	CH_4	N_2O	CO_2e
Site Preparation	4.1	0.0	0.0	4.1
Grading	18.0	0.0	0.0	18.0
Building Construction	319.0	0.0	0.0	320.0
Paving	13.0	0.0	0.0	13.0
Architectural Coatings	5.4	0.0	0.0	5.4
Total Project Emissions	**359.5**	**0.0**	**0.0**	**360.5**
Amortized Emissions	**12.0**	**0.0**	**0.0**	**12.0**

Source: Compiled by LSA (November 2017) (provided in Appendix C).
Note: Numbers in table may not appear to add up correctly due to rounding of numbers.
CH_4 = methane CO_2e = carbon dioxide equivalent N_2O = nitrous oxide
CO_2 = carbon dioxide MT/yr = metric tons per year

As shown in Table 4.7.A, Project construction would generate approximately 360.5 MT of CO_2e per year. Per SCAQMD guidance, due to the long-term nature of the GHGs in the atmosphere, instead of determining significance of construction emissions alone, the total construction emissions are amortized over 30 years (an estimate of the life of the Project) and included in the operations analysis. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life. As such, construction emissions amortized over a 30-year period would result in approximately 12 MT of CO_2e per year.

Operational GHG Emissions. Long-term operation of the proposed Project would generate GHG emissions from area and mobile sources, as well as indirect emissions from stationary sources associated with energy consumption.

Based on SCAQMD guidance, construction emissions were amortized over 30 years (a typical project lifetime) and added to the total Project operational emissions. Mobile-source emissions of GHGs would include Project-generated vehicle trips associated with on-site facilities and customers/visitors to the Project site. Area-source emissions include activities such as landscaping and maintenance and use of consumer products. Increases in stationary-source emissions would also occur at off-site utility providers as a result of an increased demand for electricity, natural gas, water, and waste by the proposed Project.

As shown in Table 4.7.B, the proposed Project would generate 1,248 MT of CO_2e/yr. The Project's emissions would be less than the SCAQMD Tier 3 threshold of 3,000 MT of CO_2e/yr for commercial projects. Therefore, Project-level and cumulative GHG emissions would be less than significant, and no mitigation is required.

Table 4.7.B: Long-Term Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/yr)					
	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Proposed Project						
Construction Emissions Amortized over 30 Years	0	12	12	0	0	12
Operational Emissions						
Area	0	0	0	0	0	0
Energy	0	255	255	0	0	257
Mobile	0	931	931	0	0	932
Waste	12	0	12	1	0	30
Water	1	13	13	0	0	16
Total Project Emissions	**13**	**1,211**	**1,224**	**1**	**0**	**1,248**
					SCAQMD Tier 3 Threshold	**3,000**
					Significant?	**No**

Source: Compiled by LSA (October 2017) (Appendix C).
Bio-CO_2 = biologically generated CO_2
MT/yr = metric tons per year
CH_4 = methane
N_2O = nitrous oxide
CO_2 = carbon dioxide
NBio-CO_2 = non-biologically generated CO_2
CO_2e = carbon dioxide equivalent
SCAQMD = South Coast Air Quality Management District

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not generate GHG emissions. Therefore, the proposed textual amendments to the LUE would not result impacts related to the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in the generation of GHG emissions. However, future individual projects resulting from the approval of the proposed LUE would be required to comply with the California Title 24 Building Energy Efficiency Standards and would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Hotel Development. The passage of the California Assembly Bill (AB) 32, created a comprehensive program to achieve real, quantifiable, and cost-effective reductions in GHGs. The law set up an economy wide cap on the State's GHG emissions at 1990 levels by 2020. It directed the California Air Resources Board (ARB) to prepare, approve, and implement a Scoping Plan for achieving the maximum technologically feasible and cost effective reductions in GHG emissions. The ARB adopted the first Scoping Plan, describing a portfolio of measures to achieve the target, in December 2008. The ARB approved the *First Update to the Climate Change Scoping Plan (Update)* on May 22, 2014. The report establishes a broad framework for continued emission reductions beyond 2020, with a goal of 80 percent below 1990 levels by 2050. In 2016, the California Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. ARB is moving forward with a second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32.

Due to the cumulative nature of climate change, the assessment of project-generated GHG emissions and the effects of global climate change impacts can only analyzed from a cumulative context. Therefore, the analysis focuses on the Project's incremental contribution of GHG

emission to cumulative climate change impacts. The GHG threshold used in this analysis is based upon a Project's cumulative contribution to global climate change impacts within the context of State legislation to reduce GHG emissions. In turn, the GHG emission reduction targets within State legislations (i.e., AB 32 and SB 32) are based upon international efforts and commitments to reduce GHG emissions.

As described further in Chapter 2.0, Environmental Setting and Project Description, the proposed Project would comply with the 2016 California Building Standards Code (California Code of Regulations, Title 24). Therefore, the proposed Project would conserve energy, and would serve to further GHG reduction targets and goals and initiatives established in AB 32 and SB 32. Therefore, no significant impacts related to the emissions of greenhouse gases would result from the proposed Project, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not generate GHG emissions. Therefore, the proposed textual amendments to the LUE would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation would be required.

Although the proposed GPA to the City's LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in the generation of GHG emissions. However, future individual projects resulting from the approval of the proposed LUE would be required to comply with the California Title 24 Building Energy Efficiency Standards and would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

4.8 HAZARDS AND HAZARDOUS MATERIALS.

Would the Project:

		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 reasonable 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 complied 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?	☐	☐	☐	☒

The discussion and analysis provided in this section is based on the *Phase I Environmental Site Assessment for the Proposed TownePlace Suites Hotel SWC West Huntington Drive & South Myrtle Avenue, Monrovia, CA 91016 (Phase I)* (Salem Engineering Group, Inc.; October 31, 2016) and the *Phase II Environmental Site Assessment Report for the Proposed TownePlace Suites Hotel SWC West Huntington Drive & South Myrtle Avenue, Monrovia, CA 91016 (Phase II)* (Salem Engineering Group, Inc.; November 13, 2017) (refer to Appendix F of this IS/MND).

Impact Analysis:

(a) Would the Project create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Hotel Development. Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable,

reactive, and an irritant or strong sensitizer.[13] Hazardous substances include all chemicals regulated under the United States Department of Transportation "hazardous materials" regulations and the United States Environmental Protection Agency (EPA) "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials is affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

Construction activities associated with the proposed Project would use a limited amount of hazardous and flammable substances/oils (e.g., fuels, lubricants, and solvents) typical during heavy equipment operation for site grading and construction. The amount of hazardous chemicals present during construction is limited and would be in compliance with existing government regulations, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the California Code of Regulations (Title 22). The potential for the release of hazardous materials during Project construction is low and, even if a release would occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials associated with construction vehicles.

The proposed Project involves the development of a hotel use on a currently vacant site. Hotel uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because neither employees on nor visitors to the site would use, store, dispose, or transport large volumes of hazardous materials. Long-term operational activities typical of hotel uses involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, fertilizers, and pesticides. For example, landscaping and maintenance activities could include the use of fertilizers and light equipment (e.g., edgers) that may require fuel. These types of activities do not involve the use of a large or substantial amount of hazardous materials. In addition, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Further, operation of the proposed Project would not require the storage, transportation, generation, or disposal of large quantities of hazardous substances.

The Los Angeles County Certified Unified Program Agency (Unified Program) is the administering agency for the chemical inventory and business emergency plan regulations for the City of Monrovia (City). The Unified Program Agency combines both the Los Angeles County Fire Department and the Los Angeles County Health Department into one primary agency responsible for hazardous materials management in Los Angeles County Agency. The Unified Program Agency also includes a number of participating fire departments in the County, including the Monrovia Fire and Rescue Department (MFRD). The Unified Program makes information regarding the appropriate handling, storage, and disposal of all hazardous chemical

[13] A "sensitizer" is a chemical that can cause a substantial proportion of people or animals to develop an allergic reaction in normal tissue after repeated exposure to a chemical (U.S. Department of Labor, 2017).

waste generated in the County publicly available to all residents and businesses in the City in order that the maintenance workers on site would use such programs to properly dispose of hazardous waste. Therefore, impacts associated with the disposal of hazardous materials and/or the potential release of hazardous materials that could occur with the implementation of the proposed Project are considered less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not create a substantial hazard to the public or environment related to hazardous materials. Therefore, the proposed textual amendments to the LUE would not result in impacts related to hazards generated as a result of the routine transport, use, or disposal of hazardous materials. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could generate hazardous materials or create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, future individual projects resulting from approval of the proposed GPA would be required to comply with existing government regulations, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the California Code of Regulations (CCR) (Title 22). In addition, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to hazards generated as a result of the routine transport, use, or disposal of hazardous materials, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Hotel Development. The purpose of the Phase I analysis was to evaluate the Project site for potential Recognized Environmental Concerns (RECs) that may be present and/or off-site conditions that may impact the Project site. The Phase I analysis prepared for the proposed Project included (1) site reconnaissance of the Project site and the surrounding area; and (2) a review of regulatory agency reports, aerial photographs, and other historic record sources. According to the Phase I analysis, an REC is "the presence or likely presence of any hazardous substances or petroleum products in, or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that

pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions."

Based on the site reconnaissance survey conducted on the Project site on October 12, 2016, no hazardous materials were observed to be stored or handled on the subject property. No RECs were identified on the site.

Although no RECs were identified on the site during the site visit, a review of the applicable agency reports, photographs, and historic records conducted as part of the Phase I evaluation identified evidence of RECs and several Historical RECs (HRECs) on the site.

Recognized Environmental Conditions. Based on a review of historical aerial photographs, fire insurance maps, historical City directories, and the City's Building Department records, the Phase I evaluation determined that the site was historically occupied with several commercial businesses of environmental concern, including a print shop and several automobile-related facilities. These businesses likely stored and handled hazardous materials on the site dating back to 1940. Consequently, the Phase I concluded that the impact to the Project site's subsurface soils due to historical uses on the site is unknown and recommended that a Limited Soil Assessment be prepared to ascertain the presence or absence constituents of concern on the site.

In November 2017, a Phase II soil and soil investigation was prepared for the subject property to address potential RECs identified in the Phase I ESA and to gather data regarding the current site conditions. The Phase II was also conducted to determine if historical operations on the site pose a potential vapor intrusion risk to future occupants on the property, and to evaluate potential construction concerns. The Phase II investigation identified the presence of underground piping associated with the historic gasoline station along the northeastern portion of the property. Results of soil sampling conducted as part of the Phase II investigation indicate that Title 22 Metal constituents and diesel and gasoline-range total petroleum hydrocarbons (TPH) were below applicable thresholds in all soil samples. Additionally, volatile organic compounds (VOCs) were below laboratory detection limits with the exception of perchloroethylene (PCE). Trace concentrations of PCE were detected in several of the soil samples, but were found at concentrations below the commercial/industrial soil vapor screening level established by the California Department of Toxic Substances Control. As such, no engineering controls (e.g., VOC vapor barrier) would be required during redevelopment of the Project site. Therefore, the soil sampling and vapor analyses conducted as part of the Phase II indicated that historic on-site gasoline station and automotive service operations do not pose a vapor intrusion risk at the property, assuming use of the site as a commercial and/or industrial use, and no further analysis would be required.

Historical Recognized Environmental Conditions. In addition to the REC identified on the Project Site, the Phase I evaluation also identified two HRECs on the property.

Based on a review of California Regional Water Quality Control Board (RWQCB) records, the first HREC identified on the property is associated with the eastern portion of the site that was formerly occupied by a gas station. In connection with the site's former use as a gas station, a

site evaluation was conducted in 1988. The results of the site evaluation identified TPH at elevated concentrations near underground storage tanks (USTs) that were present on the site at the time the evaluation was conducted. Subsequently, five USTs were removed and replaced and an expanded site assessment was conducted approximately one year later.

Results of the expanded site assessment identified elevated concentrations of TPH in several boring samples. A request for a "case closure" was denied by the Los Angeles County Department of Public Works (LACDPW) due to the failure to define the extent of the identified contamination on the site. As such, additional borings were advanced on the site. Results indicated that the contamination impacted approximately 150 cubic yards of soil to depths of approximately 50 feet (ft.) below ground surface (bgs) on the site. Consequently, three vapor extraction wells were installed and tested, which ultimately determined that the venting characteristics of the subsurface materials were not suitable for remediation activities involving vapor extraction technology. Consequently, an additional risk assessment was conducted on the site. Results of this risk assessment indicated that the risk for human exposure and groundwater impacts were low. Therefore, the site received a "case closure" designation from the RWQCB in September 1996.

In addition to site evaluations conducted on the site in 1988 through 1996, three 12,000-gallon USTs, one 550-gallon waste oil UST, 1,000-gallon waste oil UST, dispensers, piping, three hydraulic hoists, and one clarifier were removed from the property in 2003. Soil samples were collected following the removal of these facilities from the site. The results of soil sampling identified TPH as diesel (TPH-d) and total recoverable petroleum hydrocarbons (TRPH) beneath the hoists, clarifier, and waste oil USTs. Based on the identified contamination, the LACDPW re-opened the previous Leaking UST (LUST) case from 1988. Eleven borings were subsequently advanced on the site, which detected TPH-d concentrations in shallow subsurface soils and sporadic benzene concentrations in soils around the former UST pit. A small number of samples with TRPH detections were subsequently reanalyzed, and in most cases, were lower than initial results. Therefore, LACDPW issued a "no further action" designation for the site in July 2006.

Based on HRECs identified on the Project site, the Phase I evaluation determined that there is a likelihood of encountering areas of petroleum hydrocarbon-affected soil during grading and construction activities. Consequently, as described above, a Phase II was prepared in November 2017 to identify potentially contaminated soils on the subject property. Results of the Phase II indicate that soil and soil vapor on the Project site do not pose a potential risk to human health or the environment and no engineering controls (e.g., VOC vapor barrier) would be required. As such, impacts with respect to the creation of a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment during Project construction would be less than significant.

Construction activities associated with the proposed Project would include site preparation activities, building construction, paving, and the implementation of ornamental landscaping. In the event that unknown hazardous materials are discovered on site during Project construction, the Project contractor would be required to comply with a Contingency Plan developed and approved prior to the commencement of grading activities. As stated in Mitigation Measure

HAZ-1, in the event that construction workers encounter underground tanks, gases, odors, uncontained spills, or other unidentified substances, the Contingency Plan would require the contractor to stop work, cordon off the affected area, and notify the MFRD. The MFRD responder shall determine the next steps regarding possible site evacuation, sampling, and disposal of the substance consistent with local, State, and federal regulations. In addition, the California Department of Transportation (Caltrans), the California Highway Patrol, and local police and fire departments are trained in emergency response procedures for safely responding to accidental spills of hazardous substances on public roads, further reducing potential impacts to a less than significant level. With implementation of Mitigation Measure HAZ-1, potential risks associated with encountering unknown hazardous wastes during construction would be reduced to a less than significant level.

With implementation of Mitigation Measure HAZ-1, construction of the proposed Project would not create a significant hazard to the public or to the environment through reasonable foreseeable upset and accident conditions regarding the release of hazardous materials into the environment.

As stated previously, hazardous substances associated with the proposed hotel use would be limited in both amount and use such that they can be contained (stored or confined within a specific area) without impacting the environment. Project operation would involve the use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, and pesticides) typical of hotel uses that, when used correctly and in compliance with existing laws and regulations, would not result in a significant hazard to visitors, residents, or workers in the vicinity of the proposed Project. Operation of the proposed Project would not create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not create a substantial hazard to the public or environment related to the release of hazardous materials. Therefore, the proposed textual amendments to the LUE would not create a significant hazard through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the creation of a significant

hazard through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

HAZ-1 **Contingency Plan.** Prior to commencement of grading activities, the Director of the County of Los Angeles Environmental Health Division, or designee, shall approve a contingency plan that addresses the procedures to be followed should on-site unknown hazards or hazardous substances be encountered during demolition and construction activities. The plan shall indicate that if construction workers encounter underground tanks, gases, odors, uncontained spills, or other unidentified substances, the contractor shall stop work, cordon off the affected area, and notify the Monrovia Fire and Rescue Department (MFRD). The MFRD responder shall determine the next steps regarding possible site evacuation, sampling, and disposal of the substance consistent with local, State, and federal regulations.

Significance Determination with Mitigation Incorporated: Less Than Significant

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

Hotel Development. The nearest existing school, Canyon Early Learning Center, is located approximately 0.28 mile northeast of the Project site. As described in 4.8(a) and 4.8(b), the Project would not result in impacts related to hazardous emissions or the handling of hazardous materials, substances, or waste. Therefore, no impacts related to hazardous emissions or hazardous materials, substances or waste would be anticipate due to the Project site proximity to an school, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the release of hazardous materials within 0.25 mile of a school. Therefore, the proposed textual amendments to the LUE would not result in impacts related to hazardous emissions or the handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could emit hazardous emissions or handle hazardous materials, or substances. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in

accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to hazardous emissions or the handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Hotel Development. According to the Phase I evaluation prepared for the Project, the subject property is not included on any list of hazardous materials sites compiled pursuance to Government Code Section 65962.5. As previously stated in Reponses 4.8(a) and 4.8(b), construction and operation of the Project would not create a significant hazard to the public or the environment with mitigation incorporated. Therefore, with implementation of Mitigation Measure HAZ-1, impacts related to the creation of significant hazards to the public or environment would be less than significant.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in development on a listed hazardous materials site. Therefore, the proposed textual amendments to the LUE would not result in impacts related to development on a listed hazardous materials site, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements on known hazardous materials sites. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis and may require a review of the Cortese List, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts to the public or the environment as a result of development on a listed hazardous materials site, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(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?

Hotel Development. The closest airport to the Project site is the El Monte Airport, located approximately 3.8 miles southwest of the Project site in the City of El Monte. Operations at the public El Monte Airport would not produce safety hazards for Project construction workers, hotel guests, or its employees. Therefore, the proposed Project would not cause a safety hazard for people residing or working in the Project area. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City , and as such, would not in the exposure of people residing or working in the City to safety hazards associated with a public airport. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the exposure of people working or residing in the City to safety hazards from a public or public use airport, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements within the vicinity of a public airport that could result in a safety hazard for people residing or working in the Project area. Furthermore, as previously stated, the nearest airport is located over 3 miles southwest of the Crossroads District in the City of El Monte. Therefore, future individual projects resulting from the approval of the proposed GPA would not result in impacts related to the exposure of people working or residing in the City to safety hazards from a public or public use airport. No mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(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?

Hotel Development. The proposed Project site is not located within the vicinity of a private airstrip. The closest private airport to the proposed Project is Brackett Field (POC), located approximately 13 miles southeast of the Project site in the City of La Verne. Operations at the private Brackett Field would not produce safety hazards for Project construction workers, hotel guests, or its employees. Therefore, the proposed Project would not result in a safety hazard for people residing or working in the Project area. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City , and as such, would not result in the exposure of people residing or working in the City to safety hazards associated with a private airstrip. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the exposure of people working or residing in the City to safety hazards from a private airstrip, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements within the vicinity of a private airstrip that could result in a safety hazard for people residing or working in the Project area. Furthermore, as previously stated, the nearest private airport is located over 13 miles southeast of the Crossroads District in the City of La Verne. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the creation of a significant hazard safety hazard for people residing or working in the Project area, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(g) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Hotel Development. The City of Monrovia *All-Hazard Mitigation Plan* (2004) identifies ways in which the City and its residents can minimize risk and prevent loss from natural hazard events. Emergency events addressed in this plan include those associated with earthquakes, fires, flooding, windstorm, severe weather, damage to the water system, dam failure, wastewater disruption, utility loss, biological and health emergency, data and telecommunications loss, terrorism, explosion, transportation loss, economic disruption, transportation/pipeline incident, special events, aviation disaster, and sinkholes.

In addition to the City's *All-Hazard Mitigation Plan*, the City's General Plan Safety Element (2002) identifies and evaluates natural hazards associated with seismic activity, landslides, flooding and fire within the City. The General Plan Safety Element establishes goals for each of the City departments to provide responsible planning aimed at reducing impacts with respect to loss of life, injuries, damage to property and other losses associated with disasters, such as those resulting from seismic activity, flooding, and fires.

During short-term construction activities, the proposed Project is not anticipated to result in any substantial traffic queuing on nearby streets, and, with the exception of equipment and worker vehicles needed for utility line extensions, all equipment would be staged on the Project site. Additionally, all large construction vehicles entering and exiting the site would be guided by the use of personnel to avoid vehicle queuing.

The proposed Project does not include any characteristics (e.g., permanent road closure or long-term blocking of road access) that would physically impair or otherwise conflict with the City's *All-Hazard Mitigation Plan* or another adopted emergency response plan or emergency evacuation plan; however, the Project would require temporary lane closures on West Huntington Drive and South Myrtle Avenue to accommodate utility connections. Temporary

lane closures would be implemented consistent with the recommendations of the *California Joint Utility Traffic Control Manual*.[14] In addition, the Director of the City of Monrovia Public Services, or designee, would require that the Project Developer prepare and implement a Construction Staging and Traffic Management Plan (Mitigation Measure HAZ-2). The Construction Staging and Traffic Management Plan would require conditions (i.e., providing warning signs, lights, and devices) and would require that the City of Monrovia Police Department be notified a minimum of 24 hours in advance of any lane closures or roadway work (such as that required for the utility line extensions). With implementation of Mitigation Measure HAZ-2, impacts related to emergency response and evacuation plans associated with construction of the proposed Project would be less than significant.

Operation. The proposed Project consists of a hotel use and would not impair or physically interfere with an adopted emergency response plan. Roads that are used as response corridors and evacuation routes usually follow the most direct path to or from various parts of the community. For the Project site, the main corridors would be Primrose Avenue, Huntington Drive, Myrtle Avenue, and Interstate 210. Access to and from the proposed hotel Project site would be from West Huntington Drive on the north and South Myrtle Avenue on the east side of the Project site.

The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed Project would be developed in accordance with City emergency access standards. The proposed Project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on site for emergency vehicles.

As discussed in Section 4.16, Transportation/Traffic, the proposed Project would not result in a significant traffic impact to any study area intersections. Therefore, the proposed Project would not result in long-term traffic impacts that could physically interfere with an adopted emergency response plan or emergency evacuation plan. In addition, during the operational phase of the proposed Project, on-site access would be required to comply with standards established by the City and the MFRD. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to City and MFRD standards. The proposed Project would provide adequate emergency access to the site via driveways off of West Huntington Drive and South Myrtle Avenue. These two driveways would connect to an internal access way that would ensure access for emergency vehicles within the interior of the site. Therefore, operation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Potential Project impacts would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in conflicts with an adopted emergency response or evacuation

[14] This reference manual is available at the following website: https://www.sce.com/nrc/aboutsce/regulatory/distributionmanuals/tcm.pdf.

plan. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the impairment or interference with an adopted emergency response or evacuation plan, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not interfere with an adopted emergency response or evacuation plan. Future individual projects resulting from the approval of the proposed LUE would be subject to the site plan review process to ensure new development conforms to City and MFRD standards. In addition, future projects facilitated by approval of the proposed GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines.* Future individual projects would also be required to comply with all policies set forth in the City's *All-Hazard Mitigation Plan* (2004) and the General Plan Safety Element (2002). Therefore, the proposed Project would not result in impacts related to the impairment or interference with an adopted emergency response or evacuation plan, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

HAZ-2 **Construction Staging and Traffic Management Plan.** Prior to issuance of a grading permit, a Construction Staging and Traffic Management Plan shall be subject to review and approval by the Director of the City of Monrovia (City) Public Services Department, or designee. The Construction Staging and Traffic Management Plan shall include the name and phone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations. The Construction Staging and Traffic Management Plan shall include, but not be limited to, the following:

- Temporary lane closures shall be implemented consistent with the recommendations of the *California Joint Utility Traffic Control Manual* (February 2014).
- Flag persons in adequate numbers shall be provided to minimize impacts to traffic flow and to ensure safe access into and out of the site.
- Flag persons shall be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access.
- All emergency access to the Project site and adjacent areas shall be clearly marked and kept clear and unobstructed during all phases of construction.
- Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing and protection barriers. Specifically, the

plan shall identify pedestrian routes from the construction site (i.e., the Project site) to adjacent sidewalks and walkways.

- Construction-related deliveries, other than concrete and earthwork-related deliveries, shall be scheduled so as to reduce travel during peak travel periods (i.e., 6:00 a.m. to 9:00 a.m. and 3:30 p.m. to 7:00 p.m. Monday through Friday).
- If necessary, a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities shall be obtained.
- Construction vehicles, including construction personnel vehicles, shall park on the Project site and shall not park on public streets.
- Construction vehicles shall not stage or queue where they interfere with pedestrian and vehicular traffic or block access to nearby businesses.
- Any traffic lane closures shall be limited to off-peak traffic periods, as approved by the City of Monrovia Department of Public Services.
- The Monrovia Police Department shall be notified a minimum of 24 hours in advance of any lane closures or other roadway work.
- Foothill Transit shall be notified a minimum of 24 hours in advance of any lane closures or other roadway work.

Significance Determination with Mitigation Incorporated: Less Than Significant

(h) Would the Project 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?

Hotel Development. The area surrounding the Project site is considered urban and built out. The Project site is bound by office uses to the north, office uses to the east, residential and commercial uses to the south and west. The Project site is not adjacent to any wildland areas. Furthermore, according to the California Department of Forestry and Fire Protection (CalFire) and the City of Monrovia General Plan Safety Element (2002), the Project site is not located in a fire hazard area.[15] As a result, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impacts are anticipated, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in impacts associated with wildland fires. Therefore, the proposed

[15] CalFire. Fire Hazard Severity Zones in State Responsibility Area (SRA), Los Angeles County. November 7, 2007. Website: http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf (accessed August 29, 2017).

textual amendments to the LUE would not result in impacts related to the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that could result in the exposure of people or structures to risk involving wildfires. Furthermore, the portion of the City where the Crossroads District is located (including the Project site) is not identified by CalFire as a community at risk to impacts associated with wildfire. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. As such, there is no risk of exposing people or structures to a significant risk of loss, injury, or death involving wildland fires. No mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.9 HYDROLOGY AND WATER QUALITY.

Would the Project:

		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 a 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 storm water 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 structures which would impede or redirect flood flows?	☐	☐	☐	☒
(h)	Place 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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

Discussion:

The discussion and analysis provided in this section is based on the *Preliminary Hydrology and Hydraulic and Low Impact Development (LID) Report for the TownePlace Suites of Monrovia* (Preliminary Hydrology Report and LID Report) (raSmith; September 25, 2017) (refer to Appendix G of this IS/MND).

Impact Analysis:

(a) Would the Project violate any water quality standards or waste discharge requirements?

Hotel Development. Pollutants of concern during Project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased

potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled, leaked or transported via storm runoff into adjacent drainages and into downstream receiving waters. Any of these pollutants has the potential to be transported via stormwater runoff into receiving waters (i.e., Sawpit Creek).

Construction activities associated with the proposed Project would disturb approximately 1.71 acres of soil. Projects that disturb greater than 1 acre of soil are required to comply with the State Water Resources Control Board's (SWRCB) Construction General Permit. However, projects that disturb between 1 acre and 5 acres and can demonstrate there would be low erosivity potential during construction are eligible for a Small Construction Rainfall Erosivity Waiver, which exempts the project from coverage under the Construction General Permit. To obtain a waiver, the project would need to demonstrate there would be no adverse water quality impacts because construction activities would only occur when there is a low erosivity potential (i.e., the rainfall erosivity value in the Revised Universal Soil Loss Equation [R factor] for the project is less than 5). Utilizing the EPA's *Rainfall Erosivity Factor Calculator for Small Construction Sites*,[16] based on a 16-month construction schedule with a construction start date of November 1, 2018, and a construction end date of April 30, 2020, the R factor for the Project would be 113. Therefore, the Project would not qualify for a Construction General Permit waiver and would be required to comply with the SWRCB's Construction General Permit.

The Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs). Additionally, the Project would be required to prepare an Erosion and Sediment Control Plan, which includes elements of a SWPPP, in compliance with the City of Monrovia Municipal Code. Therefore, in compliance with the Construction General Permit and the City of Monrovia Municipal Code, a SWPPP and Erosion and Sediment Control Plan would be prepared and construction BMPs implemented during construction activities, as specified in Mitigation Measures WQ-1 and WQ-2. Construction BMPs would include, but not be limited to Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Potential pollutants of concern during operation of the proposed hotel include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. In the existing condition, the 1.71-acres Project site is undeveloped and consists entirely of pervious surfaces. In the proposed condition, 81 percent of the Project site (approximately 1.39 acres) would be impervious area. An increase in impervious surface area would increase the volume of runoff during a storm, which would increase the amount of pollutants discharged into downstream receiving waters.

[16] U.S. Environmental Protection Agency. Rainfall Erosivity Factor Calculator for Small Construction Sites. Website: https://www.epa.gov/npdes/rainfall-erosivity-factor-calculator-small-construction-sites.

A Preliminary Hydrology LID Report (Appendix G) has been prepared for the proposed Project that details the post-construction BMPs that would be implemented to reduce impacts to water quality during operation of the proposed Project. The proposed LID BMPs include one underground infiltration chamber in the parking lot in the northwest portion of the Project site. The infiltration chamber would be sized to accommodate 7,972 cubic feet of water. Proposed routine non-structural Source Control BMPs include education for property owners, tenants, and occupants; activity restrictions; BMP maintenance; Title 22 California Code of Regulations (CCR) Compliance; spill contingency plan; uniform fire code implementation; common area litter control; employee training; housekeeping of loading docks, common area catch basin inspection; and street sweeping of private streets and parking lots. Proposed routine structural Source Control BMPs include provision of storm drain stenciling and signage, design and construction of trash and waste storage areas to reduce pollution introduction; use of efficient irrigation systems and landscape design, and water conservation, smart controllers, and source control. As specified in Mitigation Measure WQ-3, a Final LID Plan specifying the final BMPs to target pollutants of concern in stormwater runoff from the Project site will be prepared prior to issuance of grading permits.

For the reasons outlined above, implementation of Mitigation Measures WQ-1, WQ-2, and WQ-3, which require implementation of construction and post-construction BMPs, would reduce potential impacts related to Waste Discharge Requirements, water quality standards, and degradation of water quality to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts related to water quality standards or waste discharge requirements. Therefore, the proposed textual amendments to the LUE would not result in impacts related to Waste Discharge Requirements, water quality standards, and degradation of water quality. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in impacts related the violation of applicable water quality standards. Future individual projects resulting from the approval of the proposed LUE would be required to obtain applicable wastewater permits and would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to Waste Discharge Requirements, water quality standards, and degradation of water quality, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

WQ-1 **Construction General Permit.** Prior to issuance of a grading permit, the Developer shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent (NOI) for coverage under the permit to the State Water Resources Control Board (SWRCB). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is received from the SWRCB. The Developer shall provide the WDID to the City of Monrovia (City) to demonstrate proof of coverage under the Construction General Permit. The Developer shall ensure that a Storm Water Pollution Prevention Plan (SWPPP) is prepared and implemented by the Construction Contractor for the project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in storm water runoff as a result of construction activities.

WQ-2 **Erosion and Sediment Control Plan.** If construction activities occur between October 15 and April 15, the Developer shall obtain an erosion and sedimentation control permit from the Director of the City Community Development Department, or designee prior to initiation of construction activities. As part of the erosion and sedimentation control permit application, a registered civil engineer shall prepare and submit an Erosion and Sediment Control Plan to the City for review and approval, on compliance with the requirements of the City of Monrovia Municipal Code Title 15, Chapter 15.28, Section 15.28.070. Construction activities shall not commence until the Developer receives written approval of the Erosion and Sediment Control Plan by the City.

WQ-3 **Hydrology and Hydraulic and Low Impact Development Plan.** Prior to issuance of a grading permit, the Developer shall submit a Final Hydrology and Hydraulic and Low Impact Development (LID) Report to the City Community Development Director, or designee, for review and approval, in compliance with the Los Angeles County MS4 Permit and as specified in Title 12, Chapter 12.36, Section 12.36.100 of the City of Monrovia Municipal Code. The Final Hydrology and Hydraulic and Low Impact Development (LID) Report shall include LID and Source Control Best Management Practices (BMPs) to be incorporated into the Project design to target pollutants of concern in runoff from the Project site. The Director of the City Community Development Department, or designee, shall confirm that the post-construction BMPs have been installed and a maintenance plan has been prepared prior to issuance of a Certificate of Occupancy.

Significance Determination with Mitigation Incorporated: Less Than Significant

(b) Would the Project 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)?

Hotel Development. According to the Geotechnical Investigation (Appendix E) prepared for the Project, the historically highest groundwater is estimated to be at a depth of more than 50 feet (ft.) below ground surface (bgs). Based on the anticipated depth of groundwater and the anticipated depth of excavation, which would not exceed 10 ft. bgs, groundwater is not anticipated to be encountered during excavation and groundwater dewatering (i.e., groundwater extraction) would not be required during construction.

The proposed Project would increase impervious surface areas on site by 1.39 acres, which would decrease infiltration. However, installation of the underground infiltration chamber and associated stormwater collection system would capture stormwater runoff and would reduce the impact of increasing the impervious surface area of the site. In addition, operation of the proposed Project would not require groundwater extraction. Therefore, impacts related to depletion of groundwater supplies or interference with groundwater recharge would be less than significant and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in adverse impacts related to groundwater supplies or groundwater recharge. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the depletion of groundwater supplies or interference with groundwater recharge. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would impact groundwater supplies or groundwater recharge. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to depletion of groundwater supplies or interference with groundwater recharge, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project 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 a substantial erosion or siltation on- or off-site.

Hotel Development. During construction activities, excavated soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and the transport of sediment downstream compared with existing conditions. Additionally, during a storm event, soil erosion could occur at an accelerated rate. As discussed in Response 4.9(a) above, and specified in Mitigation Measures WQ-1 and WQ-2, the Construction General Permit and City of Monrovia Municipal Code require preparation of a SWPPP and Erosion and Sediment Control Plan and implementation of construction BMPs to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. Therefore, adherence to Mitigation Measures WQ-1 and WQ-2 would ensure that construction of the proposed Project would result in a less than significant impact related to altering the existing drainage pattern of the Project site during construction activities in a manner that would result in substantial erosion or siltation on- or off-site. No additional mitigation would be required.

In the proposed condition, 1.39 acres of the site would be impervious surface areas and not prone to erosion or siltation. The remaining portion of the site (0.32 acre) would primarily be landscaping, which would minimize on-site erosion and siltation by stabilizing the soil and allowing for infiltration. The proposed Project would increase the impervious surface area on the Project site by 1.39 acres compared to existing conditions, which would increase runoff peak flow. The underground infiltration chambers would be designed to infiltrate 100 percent of the 85^{th} percentage water quality rainfall event to reduce the stormwater runoff in compliance with the County hydromodification requirements, which are designed to ensure that projects do not result in downstream hydromodification impacts (i.e., increased stream and channel instability and erosion due to increased stormwater runoff volumes, flow durations, and higher stream velocities). Because the Project would reduce stormwater runoff to meet the hydromodification requirements, the proposed Project would not contribute to downstream erosion or siltation. Finally, the proposed Project would not alter the course of a stream or river. As specified in Mitigation Measure WQ--3, a detailed final hydrology and hydraulics report would be prepared for the proposed Project to ensure that the on-site storm drain facilities, including the underground infiltration chamber, are appropriately sized to reduce stormwater runoff to meet hydromodification requirements. Therefore, with implementation of Mitigation Measures WQ-1 through WQ-3 would ensure that the Project would not substantially change the stormwater runoff from the Project site, the proposed Project would not contribute to downstream erosion or siltation. As such, impacts related to on-site or off-site erosion or siltation would be less than significant, and no additional mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not alter drainage patterns. Therefore, the proposed textual amendments to

the LUE would not result in impacts related to erosion or siltation. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in impacts related to stormwater runoff and associated downstream erosion or siltation. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions outlined in Chapter 15.28, Grading and Erosion Control, of the City's Municipal Code and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to on-site or off-site erosion or siltation, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures WQ-1 through WQ-3.

Significance Determination after Mitigation: Less than Significant Impact

(d) Would the Project 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?

Hotel Development. During construction, soil would be disturbed and compacted and drainage patterns would be temporarily altered, which can increase the volume and velocity of stormwater runoff and increase the potential for localized flooding compared to existing conditions. As discussed in Response 4.9(a), above, and specified in Mitigation Measures WQ-1 and WQ-2, the Construction General Permit and City of Monrovia Municipal Code require preparation of a SWPPP and Erosion and Sediment Control Plan and implementation of construction BMPs to control and direct surface runoff. Proper management of storm water during construction would reduce impacts associated with flooding. The Stormwater runoff would be directed into the Los Angeles County Flood Control District storm drain systems in West Huntington Drive, which, according to the Preliminary Hydrology and Hydraulic and Low Impact Development (LID) Report prepared for the Project, have additional capacity. Because additional runoff during construction will be channeled to the storm drain system, which has capacity, construction activities would not result in on- or off-site flooding. Therefore, with adherence to Mitigation Measures WQ-1 and WQ-2, construction impacts related to altering the existing drainage pattern of the site or area or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site would be less than significant. No additional mitigation would be required.

The proposed Project would increase the impervious surface area on the Project site by 1.39 acres compared to existing conditions, which would increase runoff peak flow. However,

the proposed underground infiltration chamber would capture stormwater runoff and attenuate any increase in flow. As specified in Mitigation Measure WQ-3, a detailed Final Hydrology and Hydraulic Report would be prepared for the proposed Project to ensure that the on-site storm drain facilities, including the underground infiltration system, are appropriately sized to reduce stormwater runoff and ensure that on-site flooding would not occur. In the event that runoff exceeds the 85th percentile design storm and overflow occurs, the overflow would drain to the storm drain system in Huntington Drive. The release rate of overflow would not exceed the maximum release rate of 1.04 cubic foot per second per acre (cfs/acre) in compliance with the Los Angeles County Flood Control District requirements. Because stormwater flows would be attenuated by the underground infiltration chamber to meet hydromodification requirements, and overflow would be accommodated by the downstream storm drain systems, the Project would not result in off-site flooding. Finally, the proposed Project would not alter the course of a stream or river. Therefore, with implementation of Mitigation Measures WQ-1 through WQ-3, impacts related to alteration of the existing drainage patterns in a manner that would substantially increase the rate or amount of surface runoff or result in flooding on or off site would be less than significant.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City , and as such, would not alter drainage patterns. Therefore, the proposed textual amendments to the LUE would not alter existing drainage patterns in a manner that would substantially increase the rate or amount of surface runoff or result in flooding. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in changes to existing drainage patterns. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions outlined in Chapter 15.48, Floodplain Management, of the City's Municipal Code, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any related to alteration of the existing drainage patterns in a manner that would substantially increase the rate or amount of surface runoff or result in flooding on or off site, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures WQ-1 through WQ-3.

Significance Determination after Mitigation: Less Than Significant

(e) Would the Project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Hotel Development. As discussed in Response 4.9(a) and 4.9(d) above, earthwork activities would compact soil, which could increase storm water runoff during construction. In addition, drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants such as liquid and petroleum products and concrete-related waste could be spilled, leaked, or transported via storm runoff into adjacent drainages and into downstream receiving waters. The proposed Project would be required to comply with requirements set forth by the Construction General Permit and the City of Monrovia Municipal Code, which requires preparation of an SWPPP and Erosion and Sediment Control Plan and implementation of construction BMPs to control storm water runoff, including the discharge of pollutants, as specified in Mitigation Measures WQ-1 and WQ-2. Therefore, with adherence to Mitigation Measures WQ-1 and WQ-2, impacts related to the creation or contribution of runoff that would exceed the capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff would be less than significant. No additional mitigation would be required.

As discussed in Response 4.9(a) above, pollutants of concern during operation of the proposed hotel include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. As required by Mitigation Measure WQ-3, a final LID Plan would be prepared for the Project that details the Source Control BMPs and LID BMPs that would be implemented to treat stormwater runoff and reduce impacts to water quality during operation.

As discussed in Responses 4.9(c) and 4.9(d), the proposed Project would increase the impervious surface area on the Project site by 1.39 acres compared to existing conditions, which would increase runoff peak flow. However, an underground infiltration chamber is proposed that would capture stormwater runoff to attenuate any increase in flow and meet hydromodification requirements. Additionally, in the event that runoff exceeds the 85th percentile design storm and overflow occurs, the overflow would drain to the storm drain system in Huntington Drive. The release rate of overflow would not exceed the maximum release rate of 1.04 cfs/acre in compliance with the Los Angeles County Flood Control District requirements. Because stormwater flows would be attenuated by the underground infiltration chamber to meet hydromodification requirements, and overflow would be accommodated by the downstream storm drain systems, the capacity of the downstream storm drain would not be exceeded. As specified in Mitigation Measure WQ-3, a detailed Final Hydrology and Hydraulic Report would be prepared for the proposed Project to ensure that the on-site storm drain facilities, including the underground infiltration chamber, are appropriately sized to reduce stormwater runoff. Therefore, with implementation of Mitigation Measures WQ-1 through WQ-3, the Project would not exceed the capacity of the downstream storm systems or provide substantial additional sources of polluted runoff.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not contribute to runoff. Therefore, the proposed textual amendments to the LUE would not result in impacts related to exceedances in the capacity of the downstream

storm systems or substantial additional sources of polluted runoff. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would generate runoff. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions of Chapter 12.36, Storm Water and Urban Runoff Pollution Control, of the City's Municipal Code, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to exceedances in the capacity of the downstream storm systems or provide substantial additional sources of polluted runoff, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures WQ-1 through WQ-3.

Significance Determination after Mitigation: Less Than Significant Impact

(f) Would the Project otherwise substantially degrade water quality?

Refer to Response 4.9(a), above.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures WQ-1 through WQ-3.

Significance Determination after Mitigation: Less Than Significant

(g) Would the Project 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?

Hotel Development. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project site is not located within a 100-year floodplain. The Project site is mapped as Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain) (Flood Insurance Rate Map (FIRM) No. 06037C1400F; September 26, 2008). In addition, the Project does not propose the construction of housing. Therefore, the proposed Project would not place housing within a 100-year flood hazard area, and no impacts would occur. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City,

and as such, would not result in the development of housing within a 100-year flood hazard area. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the development of housing within a 100-year flood hazard area, as delineated on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in the development of housing within a 100-year flood hazard area. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to the placement of housing within a 100-year flood hazard area, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(h) Would the Project place structures in a 100-year flood hazard area that would impede or redirect flood flows?

Hotel Development. As discussed in Response 4.9(g), above, the Project site is not located within a 100-year floodplain. The Project site is mapped as Zone X, which is defined as the area determined to be outside the 0.2 percent annual chance floodplain (500-year floodplain) (FIRM No. 06037C1315F; September 26, 2008). Therefore, the proposed Project would not place structures within a 100-year flood hazard area, and no impacts would occur. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the development of housing within a 100-year flood hazard area. Therefore, the proposed textual amendments to the LUE would not result impede or redirect flood flows as a result of development within a 100-year flood hazard area. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would result in future development in a 100-year flood hazard area. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions outlined in Chapter 15.48, Floodplain Management, of the City's Municipal Code, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*.

Therefore, the proposed GPA would not result in any impacts related to the placement of structures within a 100-year flood hazard area, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(i) Would the Project 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?

Hotel Development. As discussed previously, the Project site is not located within a 100-year floodplain. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding during a storm event.

A levee is a type of dam that runs along the banks of a river or canal that provides flood protection. A levee system failure can create severe flooding and high water velocities. According to the FEMA FIRM Map, the Project site is not within a levee inundation zone.

Dam failure is defined as the structural collapse of a dam that releases the water stored in a reservoir behind the dam. Dam failure is usually the result of the age of the structure, inadequate spillway capacity, or structural damage caused by an earthquake or flood. According to the Safety Element of the City of Monrovia General Plan, the Project site is within the Inundation Zone of the Sawpit Dam and Debris Basin. In addition, a sliver of the southern boundary of the Project site is within the Inundation Zone of the Santa Anita Wash and Dam. Due to the proximity of the mapped inundation zone for Santa Anita Wash and Dam, the potential for inundation of the entire Project site in the event of failure of the Santa Anita Dam cannot be ruled out.

According to the Safety Element (2002) of the General Plan, the Sawpit Debris Basin, located in the foothills in northern portion of the City of Monrovia, has a capacity of 476 acre-feet. The dam associated with the Sawpit Debris Basin was decommissioned and "notched" in 1994 to create a waterfall and improve earthquake safety. The Sawpit Debris Basin currently functions as a sediment entrapment facility, an engineered structure designed to capture sediments (i.e., mud, silt, sand, soil, rock, and dislodged vegetation) eroded from steep hillside watersheds upstream of the sediment entrapment facility before they can enter and block the downstream flood control systems. In the current configuration, if the debris basin failed at capacity, it would flood a drainage area of three square miles. The ensuing flood would last approximately 25 minutes and would inundate portions of the cities of Monrovia, Duarte, and Bradbury.

The Santa Anita Dam, built in 1927 and located to the northwest of downtown Monrovia, manages flows released from the 1,376 acre-feet Santa Anita Debris Basin. If the Santa Anita Dam failed at capacity, it would flood a drainage area of approximately 11 square miles. Most of the flooding would occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of the Foothill Freeway (Interstate 210).

The Sawpit Debris Basin and Santa Anita Dam are operated and maintained by the Los Angeles County Department of Public Works as part of its Debris Basin Maintenance Program. Maintenance on the debris basins includes periodic removal of sediment and vegetation clearing to restore the capacity of the debris basins and ensure they continue to provide its primary function of debris flow reduction and flood control.

The Project site is currently undeveloped. The Project involved construction of a hotel, which would introduce on-site employees and guests to the Project site. Although, the number of people on-site would increase, the Project would not increase the risk of inundation from failure of the Sawpit Debris Dam or Santa Anita Dam. In addition, the Monrovia Fire and Rescue Department has developed a citywide disaster plan and Emergency Operations Center (EOC) that would help the public be prepared for these types of emergency situations and has designated local and regional evacuation routes. Therefore, Project impacts from exposure of people or structures to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, would be less than significant. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the exposure of people or structures to flooding impacts as a result of the failure of a levee or dam. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the exposure of people and/or structures to loss, injury, or death involving flooding as a result of the failure of a levee or dam. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that would be impacted by flooding as a result of the failure of a levee or dam. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions outlined in Chapter 15.48, Floodplain Management, of the City's Municipal Code, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to the exposure of people and/or structures to loss, injury, or death involving flooding, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(j) Would the Project be subject to inundation by seiche, tsunami, or mudflow?

Hotel Development. Seiching is a phenomenon that occurs when seismic groundshaking induces standing waves (seiches) inside water retention facilities such as reservoirs and water tanks.

Such waves can cause retention structures to fail and flood downstream properties. According to the Geotechnical Investigation prepared for the proposed Project, there are no major water-retaining structures located immediately up-gradient from the Project site; therefore, inundation on the Project site from a seismically induced seiche is considered unlikely. No impacts related to seiche would occur, and no mitigation would be required.

Tsunamis are generated wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. According to the Geotechnical Investigation prepared for the Project[17], the site is not located within a coastal area; therefore, tsunamis are not considered a hazard at the Project site. Therefore, there would be no impact associated with inundation as a result of tsunami, and no mitigation is required.

Mudslides and slumps are described as a shallower type of slope failure, usually affecting the upper soil mantle or weathered bedrock underlying natural slopes and triggered by surface or shallow subsurface saturation. According to the Geotechnical Investigation prepared for the Project, there are no known landslides on the Project site and the Project site is not located in the path of any known or potential landslides. Therefore, landslides and mudflow are not considered a hazard to the project. Therefore, no impacts associated with possible mudflows and mudslides would occur, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the exposure of people or structures to flooding impacts as a result of a seiche, tsunami, or mudflow. Therefore, the proposed textual amendments to the LUE would not result in impacts related to inundation as a result of a seiche, tsunami, or mudflow. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements that be impacted by landslides and/or mudflow. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in any impacts related to possible mudflows and mudslides, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

[17] Salem Engineering Group, Inc. 2016. *Geological Engineering Investigation for the Proposed TownePlace Suites Hotel E. Huntington Drive & S. Myrtle Avenue, Monrovia, California.* September 30, 2016 (provided in Appendix E).

4.10 LAND USE/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?	☐	☐	☐	☒

Impact Analysis:

(a) Would the Project physically divide an established community?

Hotel Development. The proposed Project involves the construction of a hotel use on a currently vacant site. Vehicular access to the proposed Project would be provided by via driveway points off of West Huntington Drive and South Myrtle Avenue.

The proposed Project would require right-of-way dedications along South Myrtle Avenue and West Huntington Drive, as well as an alleyway dedication along the southern boundary of the site. As previously stated, the Project would also consolidate the existing six parcels on the Project site into one large parcel that would be bounded by the eastern edge of the Taco Bell property to the west, West Huntington Drive to the north, South Myrtle Avenue to the east, and residential and commercial uses to the south. Following the incorporation of the proposed dedication and the parcel consolidation, the APN for the undeveloped portion of the Project site would be 8508-010-901.

Construction of the proposed hotel building on the site, access improvements, roadway and alleyway dedications, and the parcel consolidation included as part of the Project would be restricted to the boundaries of the site and would therefore not result in the physical division of an established community, including the residential communities to the south of the site. Therefore, the implementation of the proposed Project would not result in the physical division of any established community, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the division of an established community. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the division of an established community, and no mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan Land Use Element (LUE) would allow for the intensification and development of

underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the division of an established community. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the division of an established community, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project 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?

Hotel Development. The main documents regulating land use on the Project site are the City of Monrovia General Plan and the Zoning Ordinance. The Project site is designated and zoned as Business Enterprise (BE) on both the City's General Plan Land Use Map and Zoning Map. The proposed Project's relationship to these planning documents is described further below.

General Plan. The City's General Plan is the principal land use document guiding development within the City. The City's General Plan is a comprehensive plan that establishes goals, objectives, and policies intended to guide growth and development in the City. The General Plan also serves as a blueprint for development throughout the community and is the vehicle through which the community needs, desires, and aspirations are balanced. The Monrovia General Plan is the fundamental tool for influencing the quality of life in the City.

At the heart of the General Plan is the LUE (adopted in 2008 and revised in 2015). The LUE establishes land uses and develops a long-term land use vision for these land uses throughout the City through the year 2030. The LUE also includes goals and policies for each land use district and implements them through implementation strategies.

As noted previously, the proposed Project includes a GPA that would: (1) modify of the land use designation on the Project site from BE to Office/Research and Development/Light Manufacturing (ORDLM); (2) incorporate hotels as an allowable use within the ORDLM designation; (3) amend the floor-to-area ratio (FAR) for the ORDLM Land Use Designation in the Crossroad District from 0.75 to 2.0, and (4) increase the allowable building height from four to five stories (65 ft.) for the ORDLM Land Use Designation in the Crossroad District. The proposed Project also include text amendments to the City's Land Use Element; the text revisions clarify language and remove duplicate text, but do not otherwise change allowable land uses (refer to Appendix A). Refer to the GPA discussion below for further discussion of proposed changes proposed to the City's General Plan.

The Project site is currently vacant and undeveloped. Following Project implementation, the currently undeveloped portion of the site would be developed with a five-story hotel use with a building intensity (i.e., FAR) of 0.91, which would be lower than the FAR of 2.0 proposed for the ORDLM designation.

Table 4.10.A provides a consistency analysis of relevant goals and policies from the City's General Plan. In order to eliminate repetitive policies and focus on key issues, policies that are not relevant to the proposed Project are not included in Table 4.10.A. As stated in this table, the proposed Project would be consistent with applicable General Plan policies following approval of the requested GPA, and no mitigation would be required.

In addition to the above listed goals and policies, the City's General Plan Land Use Element indicates that the corner of Huntington Drive and Myrtle Avenue should be a focal point highlighting where the City's Old Town extension meets the high-tech corridor. The Land Use Element encourages the use of trees, street furniture, signal design, lighting, public art, and interesting paving designs to create this focal point. As described throughout Table 4.10.A, above, the proposed Project would develop the currently vacant site with a hotel building developed in a modern architectural style. The Project would include the addition of a pedestrian plaza on the north side of the hotel building along West Huntington Drive. This plaza would feature flowering accent trees and landscaping, a trellis, varied pavers, and pedestrian furniture. As such, the proposed Project would be designed to ensure that the Project site would serve as a focal point within the Crossroads District area of the City, consistent with the General Plan.

For the reasons outlined above, the proposed Project would be consistent with the City's General Plan, and no mitigation is required.

Zoning Ordinance. The City's Zoning Ordinance is the primary implementation tool for its General Plan Land Use Element and the goals and policies contained therein. For this reason, the Zoning Map must be consistent with the General Plan Land Use Map. The Land Use Map indicates the general location and extent of future land uses in the City. The Zoning Ordinance, which includes the Zoning Map, contains more detailed information about permitted land uses, building intensities, and required development standards.

The existing zoning classification for the Project site is BE. According to the City's Municipal Code, the BE zone allows for athletic clubs, automobile accessory services, automobile parking, automobile rentals, business support services, childcare services, communication services, financial institutions, instructional services, medical laboratory services, medical outpatient facilities, restaurants, retail, service commercial, veterinary services, light manufacturing, postal service, research and development, warehousing/wholesaling, cultural exhibits, and utility distribution facilities, as well as several conditionally permitted uses.

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
Land Use Element	
GOAL 1: Provide for a mix of land uses (residential, commercial, industrial) which provides a balanced community.	**Consistent.** The proposed Project includes the development of a hotel building on a currently vacant lot, which would serve to add to the existing mix of residential, commercial, and office uses in the Project vicinity, including the Taco Bell restaurant west of the site. Therefore, the proposed Project would be consistent with Goal 1.
Policy 1.7: Provide for location of commercial uses offering goods or services necessary to support office, industrial, and research and development uses.	**Consistent.** As previously stated, the proposed Project includes the development of a hotel use in an area currently characterized by commercial, residential, and office uses. The proposed Project would develop a visitor-serving use that would accommodate visitors to the area and would support existing uses in the Project vicinity. Therefore, the proposed Project would be consistent with Policy 1.7.
Policy 1.9: Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities to support the City's business community and to satisfy the demands of the City's resident population.	**Consistent.** As previously stated, the Project includes the development of a hotel use that would serve the business community in the Project vicinity. The Project would also serve to further the City's mix of land uses through the addition of commercial/hospitality use in an area predominately characterized by office, residential, and commercial uses. Therefore, the Project would be consistent with Policy 1.9.
GOAL 2: Provide adequate infrastructure for all development.	**Consistent.** As discussed further in Section 4.18, Utilities and Service Systems, minor infrastructure improvements to provide utility connections to the Project site are included as part of the proposed Project. These utility connections would ensure that the Project would receive service from utility providers servicing the site, which as described further in Section 4.18, have adequate capacity to provide service to the site during Project operation. Therefore, the proposed Project would be consistent with Goal 2.
Policy 2.1: Ensure that land use intensities are consistent with the capacities of existing and planned infrastructure and public services.	**Consistent**. Although the proposed Project would develop the currently vacant site with a hotel use that would increase the land use intensity of the site, the Project can be accommodated by existing public services and service systems. Refer to Section 4.14, Public Services, and Section 4.18, Utilities and Service Systems, for further discussion. Therefore, the proposed Project would be consistent with Policy LU-2.1.
Policy 2.3: Require that new development pay its pro rata share of the costs of services required to support that development.	**Consistent**. The Project Developer would be required to pay all Development Impact Fees outlined in the City's Municipal Code (e.g., Fire Impact Fee). Therefore, the proposed Project would be consistent with General Plan Policy 2.3.
GOAL 3: Preserve the integrity of residential neighborhoods.	**Consistent**. While the proposed Project would be developed at a higher intensity and scale than existing surrounding development, the proposed Project would be developed in a modern architectural style with large windows, varying building façades and materials, and varying rooflines that would develop the overall visual character of the site. The

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
	proposed hotel would act as a buffer between residential uses and the intersection of South Myrtle Avenue and Huntington Drive. In addition, the creation of the 16 ft. alleyway, the addition of ornamental trees along the southern boundary of the site, and the installation of a small retaining wall would serve to separate residential uses from commercial/hotel uses. Consequently, implementation of the Project would serve to improve the integrity of existing residential neighborhoods south of the Project site. Therefore, the proposed Project would be consistent with General Plan Goal 3.
Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed Project.	**Consistent**. As previously stated, the Project would be developed at an increased height and scale than surrounding development. Building materials on the ground floor would be stone veneer, and painted Exterior Insulation and Finish System (EIFS) would be utilized for the upper floors of the building. The building would also include a metal roof, fiber cement siding panels on the building façade, and aluminum grills around the windows. These materials would serve to enhance the visual quality of the building and would be reflective of the building's modern architectural style. The overall design and modern architectural style of the proposed hotel building would be consistent with modern architectural styles of newer office buildings in the Project vicinity. Therefore, the proposed Project would be consistent with General Plan Policy 4.1.
Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed Project.	**Consistent**. As previously stated, the proposed Project would be developed at an increased height and scale compared to existing development in the Project vicinity. However, the Project would be developed in a modern architectural style that would be consistent with the modern architectural style of office buildings in the Project vicinity. Additionally, the Project would include ornamental trees along the southern perimeter of the site and landscaping along the western boundary of the site to visually screen and buffer the Project site from residential and commercial uses south of the site. Therefore, the proposed Project would be consistent with General Plan Policy 4.2.
GOAL 5: Encourage new development that is compatible with and complements existing land uses.	**Consistent**. The proposed Project includes the development of a hotel use that would serve to support existing office, commercial, and residential uses in the Project vicinity. The proposed Project would visually improve the currently vacant Project site, and would be developed in a modern architectural style that would visually complement existing commercial and office uses surrounding the property. Therefore, the proposed Project would be consistent with General Plan Goal 5.

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
Policy 5.1: Consider the impacts of new development on infrastructure.	**Consistent**. As discussed further in Section 4.18, Utilities and Service Systems, the proposed Project includes minor infrastructure improvements and utility connections. Implementation of the proposed Project can be accommodated by existing utility and service providers and would not require nor necessitate the need for new or expanded facilities. Furthermore, as described further in Section 4.16, Transportation/Traffic, implementation of the proposed hotel use would not result in adverse traffic impacts that would require or necessitate improvements to the existing circulation system within the Project vicinity. Therefore, the proposed Project would be consistent with General Plan Policy 5.1.
GOAL 6: Reduce the impact of noise on residential uses.	**Consistent**. As discussed further in Section 4.12, Noise, the proposed Project would have less than significant noise impacts with mitigation incorporated. Specifically, the Project would be required to comply with Mitigation Measure NOI-1, which itself requires the implementation of noise-reducing measures during Project construction; NOI-2, which requires Project-related operational activities to comply with the City's noise and land use compatibility standards limiting vendor deliveries to the hours between 7:00 a.m. and 7:00 p.m. Therefore, compliance with Mitigation Measures NOI-1 and NOI-2 would ensure that the proposed Project would be consistent with General Plan Goal 6.
GOAL 7: Provide for the revitalization of deteriorating land uses and properties.	**Consistent**. The proposed Project involves the development of a new hotel building on a currently vacant and under-utilized Project site. As such, implementation of the proposed Project would serve to both economically and visually revitalize the subject property and surrounding area. Therefore, the proposed Project would be consistent with General Plan Goal 7.
Policy 7.5: Encourage future commercial land uses along West Huntington Drive that are compatible with the newer, sub-regional commercial uses that have been recently developed in the area.	**Consistent**. The proposed Project involves the development of a new hotel at the intersection of West Huntington Drive and South Myrtle Avenue in the Crossroads District of the City. The proposed Project would be compatible with existing commercial uses in the area, but would primarily serve to support existing office uses in the area and visitors to the City. Therefore, the proposed Project would be consistent with General Plan Policy 7.5.
Policy 8.3: Encourage regional uses such as large retailers, hotels and restaurants on West Huntington Drive.	**Consistent**. The proposed Project involves the development of a new hotel use at the intersection of West Huntington Drive and South Myrtle Avenue in the Crossroads District of the City. Therefore, the proposed Project would be consistent with General Plan Policy 8.3.

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
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.	**Consistent**. The proposed Project would implement sustainability features consistent with provisions in the California Title 24 Energy Code. For example, the Project would incorporate water efficient landscaping and irrigation, Energy Star Appliances, an improved efficiency heating, ventilation, and air conditioning (HVAC) system, and a solar-ready roof that would serve to reduce the Project's demand for water and energy resources. Therefore, the proposed Project would be consistent with General Plan Policy 10.6.
Policy 10.9: Require water efficient landscaping in regard to plant selection and irrigation.	**Consistent**. The proposed Project would incorporate water efficient landscaping and irrigation throughout the Project site, consistent with provisions in the California Title 24 Energy Code. Therefore, the proposed Project would be consistent with General Plan Policy 10.9.
Policy 11.7: Comply with the National Pollutant Discharge Elimination System regarding storm water management to reduce impacts from storm water run-off.	**Consistent**. As discussed further in Section 4.9, Hydrology and Water Quality, the proposed Project would comply with all National Pollutant Discharge Elimination System (NPDES) requirements and would prepare a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan (Mitigation Measures WQ-1 and WQ-2), which require that the Project implement several best management practices (BMPs) aimed at reducing impacts related to stormwater runoff. Specifically, the Project would include Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site. Additionally, the Developer would be required to prepare a Final Hydrology and Hydraulic and Low Impact Development Report (Mitigation Measure WQ-3), which would outline Low Impact Development and Source Control BMPs to be incorporated into the Project design to target pollutants of concern in runoff from the Project site. With implementation of Mitigation Measures WQ-1 through WQ-3, Project-related impacts regarding runoff would be less than significant. Therefore, the proposed Project would be consistent with General Plan Policy 11.7.
GOAL 13: Promote high quality design in all new commercial and industrial development.	**Consistent**. As discussed further in Chapter 2.0, Environmental Setting and Project Description, and Section 4.1, Aesthetics, the proposed hotel would be designed in a modern architectural style and would be constructed with large windows and varied building façades, materials, and roof lines that would serve to increase the overall visual interest. The building would feature a modern color palette and building materials that would create visual interest and would highlight the varied building façades. Building materials on the ground floor would be stone veneer, and painted EIFS, would be utilized for the upper floors of the building. The hotel would also include a metal roof, fiber cement siding panels on the building façade, and aluminum mechanical grills around the windows. Refer to Figures 2.8.a and 2.8.b for

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
	examples of the proposed building design and exterior elevations. As such, the Project would increase the visual quality and character of the Project site as compared to existing conditions. Therefore, the proposed Project would be consistent with General Plan Goal 13.
Policy 13.5: Encourage "pedestrian friendly" designs for office and retail commercial uses.	**Consistent**. As discussed further in Chapter 2.0, Environmental Setting and Project Description, the proposed hotel would be designed in a modern architectural style and would be constructed with large windows and varied building façades that would serve to enhance the "human scale" of the proposed development. The proposed hotel building would also be set back from West Huntington Drive and South Myrtle Avenue and would feature an outdoor dining area with pedestrian furniture and landscaping along West Huntington Drive to improve the "pedestrian friendly" nature of the Project. Therefore, the proposed Project would be consistent with General Plan Policy 13.5.
Circulation Element	
Policy 1.3: Locate new industrial and commercial developments and their access points in such a way that traffic does not impact local residential streets and alleys for access to the development and its parking.	**Consistent**. As discussed further in Section 4.16, Transportation/Traffic, development of the proposed hotel would have a less than significant impact related to transportation and circulation. Furthermore, the Project would not result in impacts associated with vehicular queuing on roadways within the Project vicinity or on residential streets. Access to the Project site would be provided from South Myrtle Avenue and Huntington Drive; no Project site access would be provided from a residential street or alley. Therefore, the proposed Project would be consistent with General Plan Policy 1.3.
Policy 6:5: Encourage the provision of an accessible and secure area for bicycle storage at all new and existing developments.	**Consistent**. As discussed further in Chapter 2.0, Environmental Setting and Project Description, the proposed Project would incorporate bicycle racks near the entrance to the hotel building. Therefore, the proposed Project would be consistent with General Plan Policy 6.5.
GOAL 8: Provide an adequate supply of convenient parking for all developments in the City, in a manner consistent with the goals of managing transportation demand and providing efficient arterial traffic flows.	**Consistent**. As discussed further in Chapter 2.0, Environmental Setting and Project Description, the proposed Project includes the provision of 109 parking spaces, which would be consistent with the City's requirement to provide 1 parking space for each guest room. However, the Project would require a Minor Exception to allow for 23 compact spaces to count towards the total parking count. With approval of the Minor Exception, the Project would comply the City's parking requirements. Therefore, the proposed Project would be consistent with General Plan Goal 8.

Table 4.10.A: General Plan Consistency Analysis

Select General Plan Policies	Consistency Analysis
Safety Element	
Policy 2.1.6: For all projects that require grading, a soils engineering report shall be required to include data regarding the nature, distribution and strengths of existing soils, conclusion and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading. This investigation and report shall be performed by a professional soil engineer experienced in the practice of soil mechanics and registered with the State of California.	**Consistent**. As discussed further in Section 4.6, Geology and Soils, a Geotechnical Investigation (September 30, 2016; provided in Appendix E) prepared for the Project documents the soil conditions on the site and outlines conclusions and recommendations regarding grading activities, building design, and infrastructure improvements included as part of the Project. Specific recommendations outlined in the Geotechnical Investigation for the Project are included as Mitigation Measure GEO-1. Therefore, the proposed Project would be consistent with General Plan Policy 2.1.6.
Housing Element	
Policy 1.1 Neighborhood Character: Preserve the character, scale and quality of established residential neighborhoods.	**Consistent.** As described further in Section 4.1, Aesthetics, the proposed building would be developed at a height and scale that would be greater than the height and scale of existing development surrounding the Project site. However, the hotel building would be developed in a modern architectural style, would feature high-quality materials, would incorporate varied building façades and large windows, and would implement ornamental landscaping to enhance the visual quality of the Project site following Project implementation. The Project would also include a row of ornamental trees and a vegetated screen hedge (3.5 to 4 ft. in height) along the southern boundary of the site, which would serve to visually shield the site from residential uses to the south. Furthermore, because the existing Project site is currently characterized by an undeveloped dirt lot with scattered debris, the proposed Project improvements would represent an improvement in the visual character and quality of the site over existing conditions. Therefore, the proposed Project would be consistent with General Plan Policy 1.1.

Source: City of Monrovia General Plan (as adopted).

The proposed Project would request a Zoning Map Amendment to rezone the site as ORDLM and a Zoning Code Amendment to add hotel uses as a conditionally permitted use within the areas of the Crossroads District with the ORDLM zoning classification. As such, the Project would request a Conditional Use Permit (CUP) to allow operation of the proposed hotel use on the site and would potentially request a CUP to allow for on-site alcohol consumption. The Project would also request a Tentative Parcel Map to consolidate the six parcels on the undeveloped portion of the site into one large parcel, as well as a Minor Exception to allow for use of 23 compact parking stalls towards the Project's total parking count.

Title 17, Zoning Code, of the City's Municipal Code establishes development standards for each zoning classification on the City's Zoning Map, including the ORDLM zoning classification. Table 4.10.B, ORDLM Development Standards, outlines development standards for the ORDLM zoning classification and analyzes the proposed Project's consistency with these standards.

Table 4.10.B: ORDLM Development Standards

Development Standard		Project Consistency
Minimum Lot Area	20,000 sf	*Consistent.* The Project site is a total of 72,380 sf (1.71 acres). Therefore, the Project would be consistent with the minimum lot area standard for the ORDLM zoning classification.
Front Yard Setback (bounded by a street)	10 ft.	*Consistent.* The Project would provide a 10 ft. setback from the edge of the roadway right-of-way on West Huntington Drive. Therefore, the Project would be consistent with the front yard setback standard for the ORDLM zoning classification.
Side Yard Setback (bounded by a street)	10 ft.	*Consistent.* The Project would provide a 10 ft. setback from the edge of the roadway right-of-way on South Myrtle Avenue. Therefore, the Project would be consistent with the side yard setback standard for the ORDLM zoning classification.
Side Yard Setback (bounded by an alley or another lot)	No setback required	*Consistent.* The western boundary of the property abuts a lot developed with an existing Taco Bell restaurant. Therefore, no setback is required.
Rear Yard Setback (bounded by an alley or another lot)	No setback required	*Consistent.* The southern boundary of the property abuts an alleyway. Therefore, no setback is required.
Fences	Maximum of 8 ft. in height	*Consistent.* The Project would include a 1.03 ft. high retaining wall along the southern perimeter of the site, as well as a 0.72 ft. high wall along the western perimeter of the site. No other walls or fences are proposed as part of the Project. Therefore, the Project would be consistent with the fence standards for the ORDLM zoning classification.
Screening Walls	Required between commercial developments and abutting residential developments	*Consistent.* As illustrated by Figure 2.9, Landscape Plan, the Project includes a densely vegetated hedge (3.5 to 4 ft. in height) and a row of trees that would serve as a screening wall along the southern boundary of the site. The densely vegetated hedge and the row of trees would serve as a visual buffer between the proposed Project and existing residences south of the site. Therefore, the Project would be consistent with screening wall standards for the ORDLM zoning classification.
Trash Enclosures	Shall be enclosed or screened with a 6 ft. high wall with metal opaque fates and shall be located to allow for convenient pickup and disposal.	*Consistent.* As illustrated by Figure 2.9, Landscape Plan, the Project would include a trash enclosure in the southern area of the on-site surface parking lot. The trash enclosure would be enclosed or screened with an 8 ft. high block wall on three sides and metal doors on the fourth side. The enclosure would visually screen the trash enclosure from residential and commercial uses south of the site. Therefore, the Project would be consistent with the trash enclosure standards for the ORDLM zoning classification.

Table 4.10.B: ORDLM Development Standards

Development Standard		Project Consistency
Landscaping	Required throughout setbacks and areas visible from public roadways, and in and around parking areas visible from public right-of-way.	*Consistent.* As illustrated by Figure 2.9, Landscape Plan, the Project would include landscaping along the perimeter of the Project site and throughout the on-site parking lot. Therefore, the Project would be consistent with landscaping standards for the ORDLM zoning classification.
Parking	1 space per room for hotel uses.	*Consistent.* As described further in Chapter 2.0, Environmental Setting and Project Description, the Project would include a total of 109 hotel rooms and correspondingly, would provide 109 on-site parking spaces. However, the Project would require a Minor Exception to allow for use of 23 compact parking stalls towards the Project's total parking requirement. Therefore, the Project would be consistent with the parking standards for the ORDLM zoning classification.
Sale of Alcoholic Beverages	Allowed with approval of a Conditional Use Permit (CUP).	*Consistent.* As described further in Chapter 2.0, Environmental Setting and Project Description, the Project would request a CUP to allow for on-site alcohol consumption. Therefore, the Project would be consistent with the standards regulating the sale of alcoholic beverages in the ORDLM zoning classification.

Source: City of Monrovia Zoning Code, Chapter 17.16, Commercial Industrial Development Standards; Chapter 17.20 Landscaping/Tree Preservation; and 17.24, Parking.
ft. = foot/feet
ORDLM = Office/Research and Development/Light Manufacturing
sf = square foot/feet

As evidenced by Table 4.10.B, the proposed Project would be consistent with applicable zoning code development standards, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that would conflict with applicable land use plans, policies, or regulations. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with applicable plans and/or documents regulating land use in the City. No mitigation would be required.

The proposed GPA to the City's General Plan LUE would include several textual revisions and modifications to the City's General Plan LUE, and would also incorporate the following changes to the Crossroads District: (1) increase the allowable FAR from 0.75 to 2.0 in the ORDLM land use designation (2) increase the allowable building height from four to five stories (65 ft.) in the ORDLM designation, (3) allow for hotel uses in areas of the Crossroads District with the ORDLM land use designation. While not proposed as part of the Project, these changes would allow for the intensification and development of underdeveloped parcels within the Crossroads District of the City, all of which are currently designated ORDLM (with the exception of the Project site). While the proposed changes would increase the development potential within the Crossroads

District, the changes do not propose any physical improvements. As such, the GPA would allow for existing development in these areas to largely remain in their existing condition, while also allowing for future development at higher intensities to accommodate forthcoming growth in the City. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to conflicts with applicable plans and/or documents regulating land use within the Crossroads District, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?

Hotel Development. As stated in Response 4.4(f), the Project site is not located within the boundaries of a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other local or regional conservation plan. Therefore, implementation of the proposed Project would not result in any impacts to an HCP or NCCP, or other approved local, regional, or State HCP, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in conflicts with an adopted HCP, NCCP, or State HCP, and no mitigation would be required.

As previously stated, the City is not located within an area covered by an HCP, NCCP, or any other local or regional conservation plan. Therefore, future projects resulting from approval of the proposed GPA would not result in impacts related to conflicts with any HCP, NCCP, or other approved local, regional, or State HCP, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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?	☐	☐	☐	☒

Impact Analysis:

(a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Hotel Development. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act, which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into the following four Mineral Resource Zones (MRZ):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits, the significance of which cannot be evaluated.
- **MRZ-4:** An area where available information is inadequate for assignment to any other MRZ zone.

Of the four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the State of California Mining and Geology Board as being "regionally significant." Such designations require that a Lead Agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies and that it consider the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

The Project site has been classified by the California Department of Mines and Geology as being located in MRZ-4, indicating that the Project site is located in an area where there is inadequate

information to assign the region to any other MRZ Zone.[18] Although the California Department of Mines and Geology classified the site as MRZ-4, there are no mineral resources or mineral resource extraction activities on the Project site. Additionally, according to the Geotechnical Investigation prepared for the Project (Appendix E), soils on the Project site predominantly consist of gravelly sand and Artificial Fill, which are not considered mineral resources of value. The Project would not result in the loss of a known commercially valuable mineral resource that would be of value to the region and the residents of the State because no known mineral resources are present on the Project site. Therefore, the proposed Project would not result in impacts related to the loss of availability of a known mineral resource that would be of value to the region and residents of the State, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in impacts to known mineral resources. Therefore, the proposed textual amendments to the LUE would not result in impacts related to known mineral resources that would be of value to the region and the residents of the State. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City of Monrovia's (City) General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would 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. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development. As discussed further in Response 4.11(a), no valuable mineral resources exist on or near the Project site, and no mineral resource extraction activities occur on the site. In addition, the Project site is not located within an area known to contain locally important mineral resources. Therefore, the Project would not result in the loss of availability of a locally

[18] California Department of Mines and Geology, Generalized Aggregate Resources Classification Map for the San Gabriel Valley and Adjacent Production-Consumption Regions. 1982.

important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan as a result of Project implementation. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not impact locally-important mineral resource recovery sites. Therefore, the proposed textual amendments to the LUE would not result in impacts related to locally-important mineral resource sites, as delineated on a land use plan. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the loss of availability of a locally-important mineral resource. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the GPA would not result in impacts related to the loss of availability of a locally-important mineral resource, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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?	☐	☐	☐	☒

Introduction

The discussion and analysis provided in this section describes the potential short-term construction noise and vibration impacts associated with the proposed Project. This section is based on noise modeling and analysis conducted by LSA (October 2017) (refer to Appendix H) for the proposed Project.

Technical Background

The following provides an overview of the characteristics of sound and the regulatory framework that applies to noise in the vicinity of the Project site.

Characteristics of Sound. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a ten-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements, which better represent how humans are more sensitive to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise-sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The maximum noise level is the maximum noise represented as L_{max}. Equivalent continuous sound level (L_{eq}) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq}, the community noise equivalent level (CNEL), and the day-night average level (L_{dn}) based on A-weighted decibels (dBA). CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and L_{dn} are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Sensitive Land Uses in the Project Vicinity. Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The proposed Project is located in urban area within the City and is surrounded by a mix of uses, including commercial, general office, and single-family and multi-family residential uses. The closest sensitive receptors are the single-family residences located approximately 30 feet (ft.) south of the Project site, which is separated from the Project site by an alleyway. In addition, the proposed Project would be considered a noise-sensitive receptor.

Characteristics of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem where the motion may be discernible, but there is less adverse reaction without the effects associated with the shaking of a building. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise, otherwise referred to as ground-borne noise. Typically, sources that have the potential to generate ground-borne noise are likely to produce airborne noise impacts that mask the radiated ground-borne noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving[19], and operating heavy-duty earthmoving equipment) and occasional traffic on rough roads. Problems with ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 ft. of the vibration source, although there are examples of ground-borne

[19] No pile driving, blasting, or substantial grading activities are proposed as part of the Project.

vibration causing interference out to distances greater than 200 ft. When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction of a project could result in ground-borne vibration that could be perceptible and annoying. Table 4.12.A illustrates the human response to various noise and vibration levels.

Table 4.12.A: Human Response to Different Levels of Ground-Borne Noise and Vibration

Vibration Velocity Level	Noise Level		Human Response
	Low-Frequency[1]	Mid-Frequency[2]	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound usually inaudible; midfrequency sound excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise acceptable for sleeping areas; midfrequency noise annoying in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events[3] per day. Low-frequency noise annoying for sleeping areas; midfrequency noise annoying even for infrequent events with institutional land uses, such as schools and churches.

Source: Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment.* May.

[1] Approximate noise level when vibration spectrum peak is near 30 Hz.

[2] Approximate noise level when vibration spectrum peak is near 60 Hz.

[3] "Infrequent events" is defined as fewer than 30 vibration events of the same kind per day.

dBA = A-weighted decibels

Hz = Hertz

VdB = vibration velocity decibels

Factors that influence ground-borne vibration and noise include the following:

- **Vibration Source:** Vehicle suspension, wheel types and condition, track/roadway surface, track support system, speed, transit structure, and depth of vibration source
- **Vibration Path:** Soil type, rock layers, soil layering, depth to water table, and frost depth
- **Vibration Receiver:** Foundation type, building construction, and acoustical absorption

Among the factors listed above, there are significant differences in the vibration characteristics when the source is underground compared to at the ground surface. In addition, soil conditions are known to have a strong influence on the levels of ground-borne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock.

Experience with ground-borne vibration indicates that (1) vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and (2) shallow rock seems to concentrate the vibration energy close to the surface and can result in ground-borne vibration problems at large distances from the track. Factors such as layering of the soil and depth to water table can have significant

effects on the propagation of ground-borne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

Applicable Noise and Vibration Standards

Noise. The City of Monrovia (City) addresses noise in the Noise Element of the City's General Plan[20] and in Chapter 9.44 of the City's Municipal Code (Noise Ordinance).[21] The Noise Element of the City's General Plan provides an understanding of existing and future noise conditions in the City, establishes a basis for evaluating potential noise impacts on future development, and includes programs to guide public and private planning to attain and maintain acceptable noise levels. The City's Municipal Code establishes laws and regulations enacted and enforced by the local community and government. In addition, the Federal Transit Administration (FTA) provides criteria for assessing construction noise impacts.

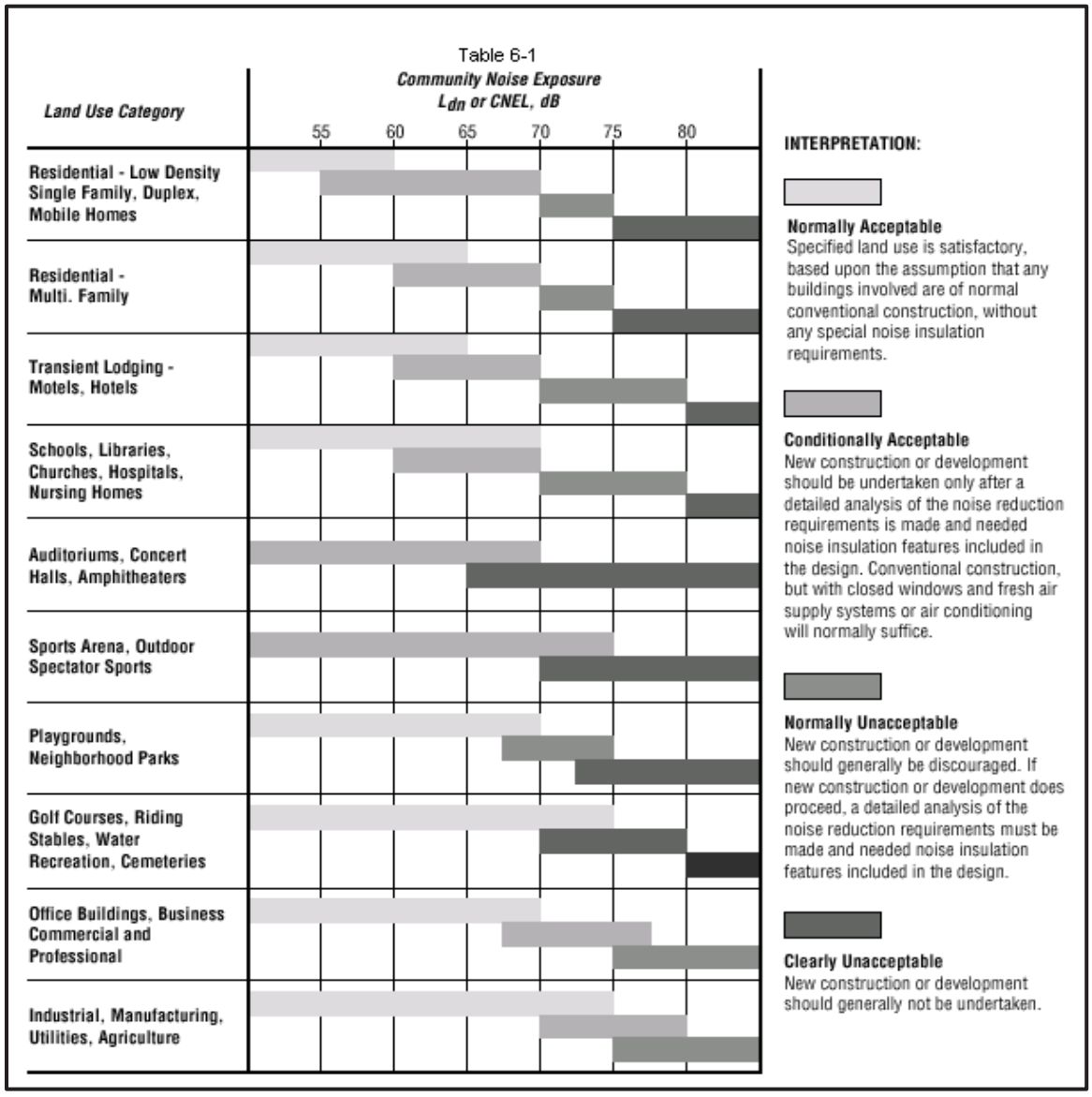
General Plan Noise Element. As noted above, applicable programs and actions governing noise in the City are set forth in the Noise Element of the General Plan. The Noise Element sets forth land use compatibility standards for community noise environments, as shown in Table 4.12.B.

As shown in Table 4.12.B, the "normally acceptable" noise level for hotels is 65 dBA L_{dn}, with a "conditionally acceptable" range of 60 dBA and 70 dBA. The "normally unacceptable" noise level is between 70 dBA and 80 dBA L_{dn}. Additionally, the following Program from the City's General Plan would be applicable to the proposed Project:

> Program No. 2: The City will extend the California Building Code (California Code of Regulations, Title 24, Part 2, Appendix Chapter 12) requirements for noise mitigation in the design and construction of new multifamily residential developments, hotels, motels, dormitories, and apartment houses to include all types of residential developments.
>
> The regulations state that:
>
> > "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either … L_{dn} or … CNEL, consistent with the noise element of the general plan."
>
> Additionally, an acoustical design analysis shall be required of any planned residential building or structure which is to be located where the exterior CNEL or L_{dn} exceed 60 dBA. The residential design should be such that the interior living spaces are exposed to an L_{dn} or CNEL of no more than 45 dB. This may be accomplished by implementing a combination of the following:
>
> 1. A reduction of the exterior noise to which the dwelling is exposed.
> 2. Installing sound-rated windows suitable for the noise reduction required.

[20] City of Monrovia, 2002. *Monrovia General Plan Noise Element.* September.
[21] City of Monrovia, 2017. *Monrovia Code of Ordinances, Chapter 9.44 – Noise*. July.

Table 4.12.B: City of Monrovia Noise Compatibility Standards



Source: City of Monrovia. *Monrovia General Plan Noise Element* (2003).

3. Configuring and insulating exterior walls and roofing systems to reduce the interior noise to acceptable levels.
4. Locating (or eliminating) vents, and mail slots, etc., to minimize sound propagation into the home.
5. Installing forced air ventilation as needed to provide a habitable living space if the interior L_{dn} or CNEL level is to be met with all or some windows closed.

Municipal Code. Chapter 9.44.080 of the City's Municipal Code prohibits construction or demolition activities outside of the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on weekends and holidays. Chapter 9 of the Municipal Code also contains residential zone regulations in Sections 9.44.030 and 9.44.090. These regulations would be applicable to the proposed Project as the Project noise would impact an adjacent residential zone. The residential zone regulations stipulate that, unless otherwise exempted in Section 9.44.080, it is unlawful for any person in any residential zone to make or cause any disturbing noise, such as amplified music, horns, or yelling, that causes the noise level to exceed the actual measured median ambient noise level or 55 dBA from 7:00 a.m. to 9:00 p.m. or 50 dBA from 9:00 p.m. to 7:00 a.m., whichever is greater.

The residential zone regulations also stipulate that it is unlawful for any person in a residential zone to make or cause any disturbing noise from any device by which voice, music, or any other sound generated is audible during the hours of 10:00 p.m. to 7:00 a.m.

Federal Transit Administration. Given that the Municipal Code exempts construction activities during the permitted hours and that no standard criteria for assessing construction noise impacts is provided, and for the purposes of determining the significance of the noise increase experienced at noise-sensitive uses surrounding the project, the guidelines within the FTA *Transit Noise and Vibration Impact Assessment* (FTA 2006) are used in this analysis for construction noise impact identification. The general assessment criteria for construction noise identifies a 1-hour noise level of 90 dBA L_{eq} for residential uses during daytime hours and a 1-hour noise level of 100 dBA L_{eq} for commercial and industrial uses. This provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction when the noise criteria are exceeded.

Vibration. The vibration standards included in the FTA's *Transit Noise and Vibration Impact Assessment* (May 2006) are used in this analysis for ground-borne vibration impacts on human annoyance, as shown previously in Table 4.12.A. The criteria account for variation in project types as well as the frequency of events, which differ widely among projects. When there are fewer events per day, it takes higher vibration levels to evoke the same community response. This is accounted for in the criteria by distinguishing between projects with frequent and infrequent events, in which the term "frequent events" is defined as more than 70 events per day while "infrequent events" is defined as less than 30 events per day.

The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. Table 4.12.C lists the potential vibration building damage criteria associated with construction activities, as suggested in the FTA's *Transit Noise and Vibration Impact Assessment* (FTA 2006). FTA guidelines show that a vibration level of up to 102 vibration velocity in decibels (VdB) (equivalent to 0.5 inches per second [in/sec] in peak particle velocity [PPV]) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction building vibration damage criterion is 94 VdB (0.2 in/sec in PPV).

Table 4.12.C: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate L_V (VdB)[1]
Reinforced concrete, steel, or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment.* May.
[1] RMS VdB re 1 µin/sec.
µin/sec = microinches per second
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

Thresholds of Significance. A project would normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and the goals of the community in which the project is located. The applicable noise standards governing the Project site are the criteria in the City's Municipal Code. Typically, compliance with the City's Municipal Code and exceedance of the FTA vibration standards listed above in Tables 4.12.A and 4.12.B are used to determine when a project results in a significant impact.

Audible increases in noise levels generally refer to a change of 3.0 dB or greater since this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, is the change in the noise level between 1.0 and 3.0 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise level of less than 1.0 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant. For the purpose of this analysis, the proposed Project creates a significant noise impact if the Project-related noise increase at an existing sensitive receptor is greater than 3 dB and the resulting noise level is greater than the standards cited below or if the project-related increase in noise is greater than 5 dBA.

Existing Noise Conditions. The ambient noise environment in the City of Monrovia is affected by a variety of noise sources including traffic, rail, aircraft, and construction-related noise sources. Motor vehicles with their distinctive noise characteristics are the dominant noise source in the Project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. Existing highway and roadway traffic noise levels in the Project vicinity were assessed using the Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA RD-77-108). This model uses a typical vehicle mix for urban/suburban areas in California and requires parameters, including traffic volumes, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the day-night average level (L_{dn}) values. Existing traffic noise levels along modeled roadway segments nearest to the Project are shown in Table 4.12.D below.

Table 4.12.D: Existing Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA L_{dn} (ft.)	Centerline to 65 dBA L_{dn} (ft.)	Centerline to 60 dBA L_{dn} (ft.)	L_{dn} (dBA) 50 Feet From Centerline of Outermost Lane
Foothill Boulevard - West of Myrtle Ave	27,591	< 50	100	209	67.1
Foothill Boulevard - East of Myrtle Ave	23,693	< 50	90	189	66.4
Huntington Drive - West of I-210 EB Ramps	27,626	< 50	100	210	67.1
Huntington Drive - I-210 EB Ramps to I-210 WB Ramps	27,626	< 50	103	211	66.4
Huntington Drive - I-210 WB Ramps to Myrtle Ave	25,299	< 50	94	198	66.7
Huntington Drive - East of Myrtle Ave	24,812	< 50	93	196	66.7
Central Avenue - West of Myrtle Ave	4,207	< 50	< 50	61	60.5
Central Avenue - East of Myrtle Ave	4,191	< 50	< 50	61	59.8
Evergreen Avenue - West of Myrtle Ave	3,600	< 50	< 50	54	59.8
Evergreen Avenue - East of Myrtle Ave	14,299	< 50	63	135	65.7
Duarte Road - West of Myrtle Ave	17,531	< 50	92	193	66.6
Duarte Road - East of Myrtle Ave	10,667	< 50	65	138	65.3
Myrtle Avenue - North of Foothill Blvd	2,631	< 50	< 50	< 50	56.9
Myrtle Avenue - Foothill Blvd to Huntington Dr	12,844	< 50	< 50	98	63.7
Myrtle Avenue - Huntington Dr to Central Ave	21,331	< 50	84	177	66.4
Myrtle Avenue - Central Ave to Duarte Rd	19,904	< 50	82	170	65.7
Myrtle Avenue - South of Duarte Rd	21,578	< 50	105	221	67.5

Source: Compiled by LSA (October 2017).
Notes: Traffic data from Monrovia Hotel Project TIA prepared by LSA (October 2017).
Traffic noise levels within 50 ft. of the roadway centerline are typically calculated manually, with site-specific information, such as topography.
Shaded cells indicate road segments directly adjacent to the Project.
ADT = Average Daily Traffic
dBA = A-weighted decibels
EB =eastbound
ft. = foot/feet
I-210 = Interstate 210
L_{dn} = day-night average level
WB = westbound

The primary source of noise on the proposed Project site is existing traffic noise on adjacent roads, as shown in Table 4.12.D. The traffic noise levels from road segments adjacent to the Project site range from 66.4 dBA L_{dn} to 66.7 dBA L_{dn} at 50 ft. from the centerline of the outermost lane. The road segments directly adjacent to the Project are shaded in Table 4.12.D.

(a) Would the Project result in 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?

Hotel Development.

Construction. Construction activities associated with the proposed Project would result in substantial temporary increase in ambient noise levels in the Project site vicinity. Potential impacts are discussed further below.

Multifamily residential uses located approximately 30 ft. south of the Project site are the closest sensitive receptors to the Project site. Maximum construction noise at any receptor location would be short-term, generally intermittent depending on the construction phase, and would vary depending on receiver distance from the active construction zone. Noise levels attenuate

with distance; therefore, noise levels would vary as construction activities move throughout various locations within the Project site. The duration of noise impacts generally would be from one day to several days depending on the phase of construction and would occur intermittently throughout Project construction (approximately 14 to 16 months).

Short-term noise impacts would occur during grading and site preparation activities. Table 4.12.E lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 ft. between the equipment and a noise receptor. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the Project area but would no longer occur once construction of the Project is completed.

Table 4.12.E: Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor[1]	Predicted L_{max} at 50 ft. (dBA)[2]	Actual Measured L_{max} at 50 ft. (dBA)[3]
All Other Equipment > 5 HP	50	85	N/A[4]
Auger Drill Rig	20	85	84
Backhoe	40	80	78
Chain Saw	20	85	84
Clam Shovel (dropping)	20	93	87
Compactor (ground)	20	80	83
Compressor (air)	40	80	78
Concrete Batch Plant	15	83	N/A
Concrete Mixer Truck	40	85	79
Concrete Pump Truck	20	82	81
Concrete Saw	20	90	90
Crane	16	85	81
Dozer	40	85	82
Drill Rig Truck	20	84	79
Drum Mixer	50	80	80
Dump Truck	40	84	76
Excavator	40	85	81
Flat Bed Truck	40	84	74
Front-End Loader	40	80	79
Generator	50	82	81
Grader	40	85	N/A
Grapple (on backhoe)	40	85	87
Impact Pile Driver	20	95	101
Jackhammer	20	85	89
Man Lift	20	85	75
Mounted Impact Hammer (hoe ram)	20	90	90
Paver	50	85	77
Pickup Truck	40	55	75
Pneumatic Tools	50	85	85
Pumps	50	77	81
Roller	20	85	80
Sand Blasting (single nozzle)	20	85	96
Scraper	40	85	84

Table 4.12.E: Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor[1]	Predicted L_{max} at 50 ft. (dBA)[2]	Actual Measured L_{max} at 50 ft. (dBA)[3]
Sheers (on backhoe)	40	85	96
Slurry Plant	100	78	78
Soil Mix Drill Rig	50	80	N/A
Tractor	40	84	N/A
Vacuum Excavator (Vac-Truck)	40	85	85
Vacuum Street Sweeper	10	80	82
Ventilation Fan	100	85	79
Vibratory Concrete Mixer	20	80	80
Vibratory Pile Driver	20	95	101
Warning Horn	5	85	83
Welder/Torch	40	73	74

Source: Federal Highway Administration. *Highway Construction Noise Handbook,* Table 9.1 (2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification (Spec.) 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
[3] The maximum noise level was developed based on the average noise level measured for each piece of equipment during the CA/T program in Boston, Massachusetts.
[4] Since the maximum noise level based on the average noise level measured for this piece of equipment was not available, the maximum noise level developed based on Spec 721.560 would be used.

dBA = A-weighted decibels
ft. = foot/feet
HP = horsepower
kVA = kilovolt-amperes
L_{max} = maximum instantaneous noise level
N/A = not applicable
RCNM = Roadway Construction Noise Model
VMS = variable message sign

Two types of short-term noise impacts could occur during construction of the proposed Project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project, which would incrementally increase noise levels on roads leading to the site. As shown in Table 4.12.E, there would be a relatively high single-event noise exposure potential at a maximum level of 85 dBA L_{max} with trucks passing at 50 ft.

The second type of short-term noise impact is related to noise generated during excavation, grading, and construction on the Project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 4.12.E lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 ft. between the equipment and a noise receptor. Average maximum noise levels range up to 87 dBA L_{max} at 50 ft. during the noisiest construction phases when multiple pieces of equipment would operate at once. The site

preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes excavating machinery such as back fillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

As previously discussed, the existing residents approximately 30 ft. south of the Project site are the closest noise-sensitive receptors to the Project site. Based on the noise levels of the various types of construction equipment listed in Table 4.12.E that may be used by the Project during construction, the noise levels at the noise-sensitive receptors south of the site, when adjusted for distance, are estimated to increase by 4.4 dBA. Therefore, existing residences south of the site could be exposed to short-term construction noise levels of 91 dBA L_{max} during some construction activities.

In addition to the reference maximum noise level, the usage factor provided in Table 4.12.E is utilized to calculate the hourly noise level (L_{eq}) impact for each piece of equipment based on the following equation:

$$Leq\ (equip) = E.L. + 10\log(U.F.) - 20\log(\frac{\mathrm{D}}{50})$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period

E.L. = noise emission level of the particular piece of equipment at a reference distance of 50 ft.

U.F. = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time

D = distance from the receiver to the piece of equipment

Each piece of construction equipment operates as an individual point source. Utilizing the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

The composite noise level of the two loudest pieces of equipment, the forklift and the tractor, during this phase of construction, as required by the FTA criteria, would be 82 dBA L_{eq} at a distance of 50 ft. from the construction area.

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA while halving the distance would increase noise levels by 6 dBA.

Maximum noise levels could reach 91 dBA $L_{max;}$ however, using on the 1-hour construction noise level criteria metric, noise levels may approach 87 dBA L_{eq} at the nearest sensitive receptor when construction activities occur near the Project site boundary. Although Project construction noise has the potential to be higher than ambient noise in the Project vicinity at times, it would cease to occur once Project construction is completed. The proposed Project would be required to comply with the construction hours specified in the City's Municipal Code, which prohibits construction activities outside the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on weekends. Therefore, construction shall only occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on weekends and holidays. In addition, construction-related noise impacts would remain below the 90 dBA L_{eq} 1-hour construction noise level criteria as established by the FTA. The Project would also comply with Compliance Measure NOI-1, which outlines procedures for reducing noise from construction equipment, procedures for notifying nearby residential uses of the construction schedule, and establishment of a "noise disturbance coordinator" to respond to local complaints regarding construction noise. Therefore, adherence with the provisions outlined in Compliance Measure NOI-1 would further ensure that Project impacts related to construction noise would be less than significant, and no mitigation would be required.

Operational Noise.

Traffic Noise Impacts. As identified above, audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Therefore, Project-related off-site traffic noise impacts would create a significant impact if traffic noise increased by 3 dBA or more over ambient noise levels without the Project. To assess traffic noise impacts, the traffic noise levels along major roadways within the Project vicinity were projected using Federal Highway Administration (FHWA) modeling. The existing and opening year traffic volumes along the roadways in the Project study area were obtained from the Project's traffic impact study.[22] Table 4.12.F lists the existing and future traffic noise levels adjacent to roadway segments in the Project vicinity.

These noise levels shown in Table 4.12.F represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn. The noise modeling indicates noise levels on the Project site are currently 66.7 dBA L_{dn} under existing conditions and would be 67.3 L_{dn} with implementation of the proposed Project.

[22] LSA. 2018. *Monrovia Hotel Traffic Impact Study*. March (provided in Appendix I).

Table 4.12.F: Traffic Noise Levels Without and With Project

Roadway Segment	Existing (2017) Daily Traffic Volumes					Opening Year (2019) Daily Traffic Volumes				
	Without Project		With Project			Without Project		With Project		
	ADT	L_{dn} (dBA) 50 ft. from Centerline of Outermost Lane	ADT	L_{dn} (dBA) 50 ft. from Centerline of Outermost Lane	Increase from Baseline Conditions	ADT	L_{dn} (dBA) 50 ft. from Centerline of Outermost Lane	ADT	L_{dn} (dBA) 50 ft. from Centerline of Outermost Lane	Increase from Baseline Conditions
Foothill Boulevard - West of Myrtle Ave	27,591	67.1	27,621	67.1	0.0	28,013	67.2	28,043	67.2	0.0
Foothill Boulevard - East of Myrtle Ave	23,693	66.4	23,701	66.4	0.0	24,031	66.5	24,039	66.5	0.0
Huntington Drive - West of I-210 EB Ramps	27,626	67.1	27,670	67.1	0.0	29,500	67.4	29,544	67.4	0.0
Huntington Drive - I-210 EB Ramps to I-210 WB Ramps	27,626	66.4	27,840	66.4	0.0	29,922	66.7	30,136	66.8	0.1
Huntington Drive - I-210 WB Ramps to Myrtle Ave	25,299	66.7	25,636	66.8	0.1	28,682	67.3	29,019	67.3	0.0
Huntington Drive - East of Myrtle Ave	24,812	66.6	24,902	66.7	0.1	26,945	67.0	27,035	67.0	0.0
Central Avenue - West of Myrtle Ave	4,207	60.4	4,252	60.5	0.1	5,953	61.9	5,998	62.0	0.1
Central Avenue - East of Myrtle Ave	4,191	59.8	4,280	59.9	0.1	5,155	60.7	5,244	60.8	0.1
Evergreen Avenue - West of Myrtle Ave	3,600	59.8	3,645	59.8	0.0	5,696	61.7	5,741	61.8	0.1
Evergreen Avenue - East of Myrtle Ave	14,299	65.7	14,388	65.8	0.1	17,042	66.5	17,131	66.5	0.0
Duarte Road - West of Myrtle Ave	17,531	66.5	17,557	66.6	0.1	19,141	66.9	19,167	66.9	0.0
Duarte Road - East of Myrtle Ave	10,667	65.3	10,675	65.3	0.0	11,261	65.5	11,269	65.6	0.1
Myrtle Avenue - North of Foothill Blvd	2,631	56.8	2,639	56.8	0.0	2,685	56.9	2,693	56.9	0.0
Myrtle Avenue - Foothill Blvd to Huntington Dr	12,844	63.7	12,910	63.7	0.0	14,481	64.2	14,547	64.2	0.0
Myrtle Avenue - Huntington Dr to Central Ave	21,331	66.4	21,632	66.5	0.1	24,130	66.9	24,431	67.0	0.1
Myrtle Avenue - Central Ave to Duarte Rd	19,904	65.7	20,014	65.7	0.0	22,662	66.2	22,772	66.2	0.0
Myrtle Avenue - South of Duarte Rd	21,578	67.4	21,586	67.5	0.1	22,509	67.6	22,517	67.6	0.0

Source: Compiled by LSA (March 2018).
Note: Traffic noise within 50 ft. of the roadway centerline should be evaluated with site-specific information.
Average daily traffic volume is displayed with rounding to the nearest hundredths digit.
Shaded cells indicated roadway segments adjacent to the Project site.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
EB = eastbound
ft. = foot/feet
I-210 = Interstate 210
L_{dn} = day-night average level
WB = westbound

The increase in Project-related traffic noise levels for future conditions would range from 0.0 to 0.1 dBA along the segments in the Project vicinity that were analyzed. This noise level increase is well below the 3 dBA increase considered to be perceptible by the human ear in an outdoor environment; therefore, off-site traffic noise impacts would be less than significant and the Project would not create a substantial permanent increase in ambient noise levels.

Stationary Source Noise. Stationary noise sources associated with the Project could include heating, ventilation, and air conditioning (HVAC) mechanical equipment, occasional truck delivery loading/unloading activities, and typical motor vehicle/parking area activities.

To determine noise levels generated by typical parking activities, such as people conversing or doors slamming, parking lot noise measurements taken by LSA staff for various other projects that are similar in scale and in nature to the proposed Project were referenced. Based on this LSA research, it was determined that noise levels of approximately 60 dBA to 70 dBA L_{max} would occur at 50 ft., while delivery truck loading and unloading activities would generate a noise level of 75 dBA L_{max} at 50 ft. Of the on-site stationary noise sources during operation of the Project, noise generated by delivery truck activity would generate the highest maximum noise levels.

A trash enclosure on site includes a loading/unloading associated with waste disposal; however, deliveries to the site would occur at the entrance canopy located at the south side of the building approximately 106 ft. from the closest sensitive receptor. At 106 ft., loading and delivery noise would be 68.5 dBA L_{max} at the closest off-site receptor. This noise exposure could exceed ambient noise levels; however, the handling of boxes, crates, garbage cans or other similar objects (i.e., deliveries) is exempt from the provisions of the City's Municipal Code during the hours of 7:00 a.m. and 7:00 p.m (Section 9.44.080, Exemptions, of the City's Municipal Code). In addition, peak noise levels from loading and unloading would be intermittent and when averaged over a 1-hour period would be much lower than the peak noise levels. Implementation of Mitigation Measure NOI-1 would restrict the hours of hotel vendor deliveries, thereby reducing impacts to a less-than-significant level.

Precise details of HVAC equipment, including future location and sizing, are unknown at this time; therefore, for purposes of this analysis, 75 dBA at 3 ft. was assumed to represent HVAC-related noise.[23] For a conservative analysis, LSA assumed a minimum unobstructed distance of 100 ft. (the closest possible distance the unit could be located) between the HVAC equipment and closest receptor. Adjusted for distance, the closest receptor would be exposed to a noise level of 49 dBA generated by the HVAC equipment. Therefore, HVAC would not create noise levels that exceed the median ambient noise levels on the Project site. Furthermore, the Project would be required to adhere to the provisions established in Compliance Measure NOI-2, which itself requires that the line-of-site between stationary noise sources (e.g., HVAC equipment) and noise-sensitive uses be blocked through the implementation of noise barriers (i.e., a concrete block wall or enclosing the noise source). Therefore, adherence with Compliance Measure NOI-2 would further ensure that the proposed Project would not substantially increase noise levels over existing conditions. Impacts to adjacent sensitive receptors would be less than significant.

[23] Trane. 2002. *Sound Data and Application Guide for the New and Quieter Air-Cooled Series R Chiller*.

Land Use Compatibility. The dominant source of noise in the Project vicinity is traffic noise from Huntington Drive and Myrtle Avenue. As shown in Table 4.12.F, the existing traffic noise levels adjacent to the Project site 50 ft. from the centerline of the outermost lane on Huntington Drive and Myrtle Avenue range from 66.7 dBA to 66.4 dBA L_{dn}, respectively. The northern edge of the hotel building is estimated to be 50 ft. from the centerline of the outermost lane on Huntington Drive resulting in an exterior noise exposure of 66.7 dBA L_{dn}. The eastern side of the hotel building is estimated to be 40 ft. from the centerline of the outermost lane on Myrtle Avenue resulting in an exterior noise exposure of 68.3 dBA L_{dn}. The City sets forth normally acceptable noise level standards for land use compatibility and interior noise exposure of new development. The normally acceptable exterior noise level for hotels is 65 dBA L_{dn}. Noise levels of 60 to 70 dBA L_{dn} are considered conditionally acceptable when a detailed analysis of noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. The normally acceptable interior noise level for hotels is 45 dB L_{dn} or less, and mechanical ventilation is required where use of windows for ventilation will result in higher than 45 dBA L_{dn} interior noise levels.

Based on the Environmental Protection Agency's (EPA) Protective Noise Levels,[24] with a combination of walls, doors, and windows, standard construction for California buildings (sound transmission class [STC]-24 to STC-28) would provide more than 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open. With windows open, the Project would not meet the City's normally acceptable interior noise standard of 45 dBA L_{dn} (i.e., 68.3 dBA – 15 dBA = 53.3 dBA). Therefore, an alternate form of ventilation, such as an air-conditioning system, would be required to ensure that windows can remain closed for a prolonged period of time. A ventilation system would reduce interior noise levels with windows closed and would meet the City's normally acceptable interior noise level criterion of 45 dBA (i.e., 68.3 dBA – 25 dBA = 43.3 dBA). Therefore, the Project would be required to implement an HVAC system to allow windows to remain closed (Mitigation Measure NOI-2), thereby reducing interior noise levels by 25 dBA. Implementation of Mitigation Measure NOI-2 would result in interior noise levels of 43.3 dBA L_{dn}, which would meet the City's interior noise standard of 45 dBA L_{dn}. Therefore, Mitigation Measure NOI-2 would ensure that the proposed Project would comply with the City's noise and land use compatibility standards.

In addition, as identified above, noise levels on the Project site are approximately 68.2 dBA L_{dn}. This noise level would be within the City's conditionally acceptable noise level of 60 to 70 dBA L_{dn} for hotels when noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. Therefore, with implementation of Mitigation Measure NOI-2, the Project would meet the City's land use compatibility standards.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would result in the generation of noise. Therefore, the proposed textual

[24] EPA. 1978. *Protective Noise Levels, Condensed Version of EPA Levels Document*. November.

amendments to the LUE would not result in the exposure of persons to or the generation of noise levels in excess of established standards, and no mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not expose persons to or generate noise levels in excess of the local general plan or noise ordinance. Future individual projects resulting from the approval of the proposed LUE would be subject to Mitigation Measures NOI-A, and NOI-C through NOI-F, of the City's General Plan Land Use and Circulation Elements EIR, which are aimed at reducing construction and operational noise impacts. Future individual projects facilitated by approval of the proposed GPA would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial noise exposure or generation, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Compliance Measures:

Compliance Measure NOI-1 **Stationary Noise Sources.** During construction activities, the Project shall comply with Mitigation Measure NOI-A of the *City of Monrovia General Plan Proposed Land Use and Circulations Elements Environmental Impact Report* (2008) to further reduce noise emitted from stationary noise sources on the Project site. As required by Mitigation Measure NOI-A, stationary noise sources associated with future non-residential uses (e.g., mechanical equipment and loading docks) within the Project areas shall not have a direct line-of- sight to noise-sensitive uses. The line-of-sight between the noise source and noise-sensitive receptor shall be blocked through the orientation of the non-residential land use and/or by using noise barriers, such as a concrete block wall or enclosing the noise source. The Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that noise-reducing measures have been implemented in the Project Design.

Compliance Measure NOI-2 **Construction.** During construction activities, the Project shall comply with Mitigation Measures NOI-C through NOI-F of the *City of Monrovia General Plan Proposed Land Use and Circulations Elements Environmental Impact Report* (2008) to further reduce construction noise. The Director of the City of Monrovia Community Development Department, or designee, shall require the Project Developer to implement the following

construction measures during construction of the Project, as required by Mitigation Measures NOI-C through NOI-F:

- All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- Grading and Construction Contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
- All residential units located within 500 feet (ft.) of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 ft. shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
- A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 ft. of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

Mitigation Measures:

NOI-1 **Vendor Delivery Hours.** Prior to issuance of a building permit (a permit issued by the City that allows construction to commence) , the Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that, at a minimum, the Developer shall limit vendor deliveries to the Project site to the hours between 7:00 a.m. and 7:00 p.m. daily.

NOI-2 **Land Use Compatibility Standards.** Prior to issuance of a building permit (a permit issued by the City that allows construction to commence), the Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that the following measures have been implemented in the Project Design:

- Installation of air conditioning, which would allow hotel room windows to remain closed.

- Incorporation of standard building construction requirements consisting of walls, windows, and doors with a minimum rating of sound transmission class (STC)-24.

Significance Determination after Mitigation: Less Than Significant

(b) Would the Project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Hotel Development.

Construction Vibration – Human Annoyance. During construction activities, the majority of the tools used are not expected to induce any vibration-related impacts. In order to provide a conservative analysis for the equipment that may cause ground-borne vibrations, for which reference information is not available, the level associated with a large bulldozer is assumed to be 87 VdB (as shown below in Table 4.12.G). The closest receptor during construction would be located approximately 30 ft. from the construction sites, resulting in vibration levels of 85 Vdb. According to the FTA's *Transit and Noise Vibration Impact Assessment* (2006), this vibration level would be acceptable if there are an infrequent number of events per day. Vibration from construction activities may be perceptible. However, construction equipment such as bulldozers would be utilized intermittently and in a limited manner in the areas along the southern boundary closest to receptors since construction in these areas would consist only of site preparation to allow for the paving of the parking area that would be located along the southern boundary of the site. Therefore, vibration annoyance exposure to sensitive receptors would not be significant.

Table 4.12.G: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft.	
	PPV (in/sec)	L_V (VdB)[1]
Vibratory Roller	0.210	94
Vibratory Compactor	0.200	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Sources: Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment.* May.
[1] RMS VdB re 1 µin/sec.
µin/sec = microinches per second
ft. = foot/feet
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

Construction Vibration– Building Damage. Ground-borne noise and vibration from construction activities would be low to nonexistent. A vibration level of 0.089 in/sec PPV would occur when measured at 25 ft. using the vibration impacts associated with a large bulldozer based on the FTA's *Transit Noise and Vibration Impact Assessment* (2006). This vibration level is considered a conservative assumption. As shown in Table 4.12.C, it would take a minimum of 0.12 in/sec PPV to cause any potential building damage. FTA guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV. As stated previously, vibration impacts would approach 0.089 in/sec PPV, which is well below the threshold for potential vibration damage; therefore, vibration impacts associated with construction would be less than significant, and no mitigation would be required.

Operational Vibration and Ground-Borne Noise. Operation of the proposed Project would not generate substantial ground-borne noise and vibration with no operation of heavy equipment, operational vibration or ground-borne noise levels are not anticipated to occur. The Monrovia light rail is located approximately a 0.5 mile south of the Project site near Duarte Road. At this distance, vibration associated with the light rail is not expected to be perceptible at the Project site. Therefore, the Project would not result in the exposure of persons to or generation of excessive ground-borne noise and vibration. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the generation of ground-borne vibration or ground-borne noise. Therefore, the proposed textual amendments to the LUE would not result in the exposure of persons to or the generation of ground-borne vibration or ground-borne vibration levels in excess of established standards, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not expose persons to or generate excessive ground borne vibration or ground borne noise levels. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in excessive ground borne noise or vibration levels, and no mitigation would be required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Hotel Development. Audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. As discussed further in Response 4.12(a), implementation of the proposed Project would not result in substantial increases in traffic noise levels on local roadways in the Project vicinity or operational noise at sensitive receptor locations. Therefore, Project-related noise increases would be less than significant.

General Plan Land Use Element Amendment. Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not result in substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial permanent increase in ambient noise levels, and no mitigation would be required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Hotel Development. As discussed in Response 4.12(a), implementation of the proposed Project would include construction activities that could result in a substantial temporary increase in ambient noise levels in the Project site vicinity above levels existing without the Project, however, construction noise would cease to occur once Project construction is completed and would be below the 90 dBA L_{eq} 1-hour construction noise level criteria as established by the FTA. The proposed Project would be required to comply with the construction hours specified in Chapter 9.44, Noise, of the City's Municipal Code, which states that construction activities must occur between the hours of 7:00 a.m. and 7:00 p.m. Compliance with the City's Noise Ordinance would ensure that construction noise does not disturb residents during the times they are most likely to be home or during hours when ambient noise levels are likely to be lower (i.e., at night). Therefore, the Project would not result in a substantial temporary or periodic increase in ambient noise in the Project vicinity during construction.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increase ambient noise levels. Therefore, the proposed textual amendments to the LUE would not result in a substantial permanent increase in ambient noise levels, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Future individual projects resulting from the approval of the proposed LUE would be subject to the construction hours outlined in Chapter 9.44, Noise, of the City's Municipal Code, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in substantial temporary or periodic increase in ambient noise levels, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(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?

Hotel Development. The proposed Project site is not within an airport land use plan, or within 2 miles of a public airport or public use airport. The closest airport to the Project site is the El Monte Airport, located approximately 3.8 miles southwest of the Project site in the City of El Monte. The Project site is not within the 55 dBA CNEL noise contours of any airport. Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels and impacts would be less than significant. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that would result in the exposure or people to excessive airport noise levels. Therefore, the proposed textual amendments to the LUE would not expose people residing or working in the Project area to excessive noise levels associated with a public airport, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not expose people residing or working in the Project area to excessive noise levels from a public or public use airport. Furthermore, the nearest public airport is located over 3 miles southwest of the Crossroads District in the City of El Monte. Additionally, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not expose people residing or working in the Project area to excessive noise levels, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(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?

Hotel Development. The proposed Project site is not located within the vicinity of a private airstrip. The closest private airport to the proposed Project is Brackett Field (POC), located approximately 13 miles southeast of the Project site in the City of La Verne. Therefore, the proposed Project would not expose hotel guests and employees to excessive noise levels associated with a private airstrip, including Brackett Field. This impact would be less than significant.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that would result in the exposure or people to excessive airport noise levels. Therefore, the proposed textual amendments to the LUE would not expose people residing or working in the Project area to excessive noise levels associated with a private airstrip, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not expose people residing or working in the Project area to excessive noise levels from a private airstrip. Furthermore, the nearest private airstrip is located over 13 miles southeast of the Crossroads District in the City of La Verne. Additionally, future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not expose people residing or working in the Project area to excessive noise levels, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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?	☐	☐	☐	☒

Impact Analysis:

(a) Would the Project 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)?

Hotel Development.

Construction. Construction of the proposed Project would provide short-term construction jobs over a period of 14 to 16 months during project construction. Construction jobs would be temporary and/or seasonal and would be specific to the variety of construction activities. The workforce would include a variety of craftspeople, such as cement finishers, ironworkers, welders, carpenters, electricians, painters, and laborers. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. Although the proposed Project would increase the number of employees at the Project site during construction activities, it is expected that local and regional construction workers would be available to serve the proposed Project's construction needs.

Project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the proposed Project; therefore, the proposed Project would result in a less than significant impact associated with inducing substantial population growth or demand for housing through increased construction employment, and no mitigation is required.

Operation. Guests of the proposed hotel would be limited to stays of 30 days or less by the City's Municipal Code. As such, the proposed Project would not cause or result in direct population growth because the proposed Project would not provide permanent housing on the Project site.

The proposed hotel would employ 22 to 26 part-time employees and 10 full-time employees. Hotel employees generally work in three shifts as follows: 7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11 p.m., and 11:00 p.m. to 7:00 a.m. Most employees work fewer than 30 hours per week. The addition of 22 to 26 part-time jobs and 10 full-time jobs would not represent a substantial number of new jobs in the City of Monrovia, which had a population of approximately 36,950

and an employment base of 16,743 persons as of 2016 (the latest year for which demographic data are available).[25] The creation of new jobs would be within forecasted growth rates for the City (projected population of 39,400 persons by 2035[26] and employment base of 23,300 persons by 2040[27]). The proposed Project would be located within an existing urbanized area and operation of the proposed Project would not induce substantial population growth or accelerate development in an underdeveloped area that exceeds projected/planned levels for the build-out year. Therefore, the proposed Project would not result in substantial population growth either directly or indirectly, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in substantial population growth in the City. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the inducement of substantial population growth, and no mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, which could increase employment growth in the City, approval of the GPA does not include any physical improvements that would induce population growth in the City. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the GPA would not result in impacts related to the inducement of substantial population growth (either directly or indirectly), and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Hotel Development. As previously stated, the proposed Project includes development of a new hotel on a currently vacant site. Therefore, the Project would not result in a loss of housing nor require or necessitate the development of replacement housing elsewhere. No mitigation would be required.

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25 United States Census Bureau. American Fact Finder. City of Monrovia. Website: https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml (accessed August 25, 2017).

26 City of Monrovia. General Plan 2014–2021 Housing Element.

27 Southern California Association of Governments (SCAG). Regional Transportation Plan/Sustainable Communities Strategy. Demographics and Growth Forecast Appendix. Website: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf (accessed May 2, 2018).

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the displacement of housing. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the loss of housing, and no mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the loss of existing housing in the City. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the GPA would not result in impacts related to the loss of housing, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Hotel Development. Refer to Response 4.13(b). Project implementation would not displace any existing housing or persons, and would not necessitate the construction of replacement housing elsewhere. No people would be displaced as a result of Project implementation, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in the displacement of people. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the displacement of a substantial number of people in the City, necessitating the construction of replacement housing elsewhere. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the displacement of people in the City. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the GPA would not result in impacts related to the displacement of a substantial number of people in the City, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.14 PUBLIC SERVICES.

Would the Project:

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the Project result in substantial adverse physical impacts associated with the provision of or 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:				
	i) Fire Protection?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☒	☐
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☐	☒

Impact Analysis:

(a) (i). 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 facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for *fire protection*?

Hotel Development. Fire protection services would be provided to the proposed Project by the Monrovia Fire and Rescue Department (MFRD). MFRD provides fire protection, emergency medical and rescue services, hazardous inspection and response, and public education activities to the City of Monrovia's (City) approximately 36,590 residents. Currently, the MFRD has two stations in the City (including the headquarters).[28] The MFRD's total emergency activity includes 20 percent fire protection and 80 percent emergency medical services. [29]

The MFRD is divided into six primary divisions: (1), Administration, (2) Operations, (3) Training and Emergency Medical Services, (4) Support Services and Disaster Preparedness, (5) Fire Prevention, and (6) Hazardous Materials. The Administration Division is responsible for planning, organizing, and leading all activities in the MFRD, including fire suppression, emergency medical services and prevention activities. The Operations Division is responsible for the implementation of life safety services, such as fire suppression, pre-hospital emergency medical care, pre-fire planning, training, apparatus maintenance, and communications support. The Training and Emergency Medical Services Division is responsible for providing pre-hospital emergency medical care and patient stabilization. The Support Services and Disaster Preparedness Division is responsible for the development and maintenance of a citywide disaster plan and Emergency

[28] City of Monrovia, Fire Department, Station Locations. Website: http://www.cityofmonrovia.org/your-government/fire-department/about-us/fire-stations (accessed August 16, 2017).

[29] City of Monrovia, Fire Department, Training and Emergency Medical Services. Website: http://www.cityofmonrovia.org/your-government/fire-department/about-us/divisions/training-and-emergency-medical-services (accessed August 22, 2017).

Operations Center (EOC) that is intended to coordinate local, State, and federal resources responding to disasters affecting the City. The Fire Prevention Division is responsible for building inspections, brush abatement, fire suppression equipment plan reviews, and fire investigations. Last, the Hazardous Materials Division works to catalogue and monitor hazardous materials and processes used by businesses within the City to ensure continued public safety.

Fire Station No. 101 (located at 141 E. Lemon Avenue) is the closest fire station to the Project site, which itself is located south of Huntington Drive between South Primrose Avenue to the west and South Myrtle Avenue to the east, approximately 0.7 miles south of Fire Station No. 101. Fire Station No. 101 would likely be the first fire station to the Project site in the event of an emergency and would thus be designated as the "first-in" station. It takes approximately 3–5 minutes for engines to arrive on scene after an emergency call has been placed.[30]

The MFRD is staffed by 41 full-time safety personnel, 10 of which are on-duty on a regular basis and one is a clerical position. The MFRD also includes two Monrovia Paramedic Squads that work under a mutual aid agreement with the Arcadia Paramedic Squad to provide emergency medical services in the City. The MFRD also has a Memorandum of Understanding (MOU) with the City of Arcadia to provide for fire protection, emergency medical services, and rescue services through automatic aid dispatch between the two cities. Another MOU exists between the Consolidated Fire Protection District of Los Angeles County and the City. This MOU outlines procedures for implementing automatic aid/initial action response between the Consolidated Fire Protection District and the City.[31]

The Project site is not located within a High Fire Hazard Zone according to the Fire Hazards Area Map in the City's General Plan Public Safety Element (2002) nor is the site located within a Special Fire Protection Area or Fire Hazard Severity Zone on the Statewide Cal Fire Map for the Los Angeles Region.[32] However, development of the proposed Project will result in an increased number of individuals on the Project site, which could increase the demand for MFRD services on the site. In order to meet MFRD standards and to comply with the California Fire Code (in effect at the time of the application for the building permit), the proposed Project would include, but not be limited to, the following safety measures:

- All buildings on the Project site would include automatic fire sprinkler systems.
- Emergency vehicles would be able to enter and exit the Project site via the driveway off West Huntington Drive and/or the driveway off South Myrtle Avenue.

[30] City of Monrovia, Fire Department. Website: http://www.cityofmonrovia.org/fire/page/frequently-asked-questions (accessed October 5, 2016).

[31] City of Monrovia. 2008. *General Plan Proposed Land Use and Circulation Elements*. *Environmental Impact Report*. January 2008.

[32] California Department of Forestry and Fire Protection (CalFire). Website: http://www.fire.ca.gov/fire_prevention/fhsz_maps/FHSZ/los_angeles/Los_Angeles.pdf (accessed August 16, 2017).

Project compliance with requirements set forth in the Fire Code would provide fire protection for people and structures, as well as emergency medical services on site. In addition, as discussed in Section 4.16, Transportation/Traffic, the proposed Project would not result in a significant traffic impact to any study area intersections. Therefore, the proposed Project would not impair emergency response vehicles, and average response times in the area would remain within acceptable response time limits, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for fire protection services. Therefore, the proposed textual amendments to the LUE would not result in impacts related to fire protection services. No mitigation would be required.

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in an increased demand for fire services in the City. However, future individual projects facilitated by approval of the proposed GPA would be required to comply with applicable MFRD standards and the California Building Code. In addition, future individual projects resulting from the approval of the proposed LUE would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to fire services, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(a) (ii). 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 facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for *police protection*?

Hotel Development. Police protection services would be provided to the proposed Project by the City of Monrovia Police Department (MPD).

The MPD is responsible for protecting and serving the City's residents, in addition to the commuters, visitors, and daytime business population. The MPD has one station located at 140 E. Lime Avenue, approximately 0.8 mile northeast of the Project site.

The MPD is comprised of seven departments: (1) Administration, (2) Support Services Division, (3) Operations Division, (4) Detective Bureau, (5) Communications Center-Crime Analysis and Technology Bureau (CCAT), (6) Community Policing Bureau, and (7) Animal Control

Administration, which provide leadership, budget coordination and management, personnel and payroll administration, planning, organizational development, and community support. The Support Services Division is managed by one police captain who has overall responsibility for management of the Records; CCAT; Detective, and Community Policing Bureaus. The Operations Division includes Uniform Services, Bicycle Patrol, and Police Motorcycles for traffic enforcement. The Detective Bureau is responsible for follow-up and completion of felony and misdemeanor criminal cases and preparation of these cases for filing with the District Attorney's Office. CCAT is the public safety answering point for both the Police and Fire Departments in the City of Monrovia.[33] In an average month, the CCAT handles approximately 2,100 telephone calls, dispatches 1,500 calls for service, and processes 27,900 radio requests. The Community Policing Bureau seeks to improve the quality of life for Monrovia residents by targeting criminal and social problems in the community, as well as coordinating and managing Neighborhood Watch, child identification and fingerprinting, station tours, home security checks and seminars, business security and crime prevention training. The Animal Control Division is operated by the Pasadena Humane Society and the Society for the Prevention of Cruelty to Animals (SPCA), which work together to provide animal control services in the City.

The current MPD staffing level is 80 full-time police personnel to 37,000 residents, or a ratio of 2.16 MPD staff per 1,000 residents.[34]

As previously stated in Section 4.13, Population and Housing, development of the proposed Project would result in an increase of 22 to 26 part-time employees and 10 full-time employees on the Project site. Employees are expected to be drawn from the existing employment base in the region; the proposed Project is not expected to induce population growth. While the potential increase in employees and visitors to the site could result in an increase in calls for police services, the proposed Project would not change officer-to-population ratios (currently 2.22 MPD staff per 1,000 residents) in the City thereby increasing facility/equipment maintenance needs. Although the proposed Project would incrementally contribute to the demand for additional police services, the impact of the proposed Project on police protection would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for police protection services. Therefore, the proposed textual amendments to the LUE would not result in impacts related to police protection services. No mitigation would be required.

[33] City of Monrovia, Program Budget. Fiscal Year 2016–2017. Website: http://www.cityofmonrovia.org/home/showdocument?id=484. (accessed August 22, 2017).

[34] City of Monrovia, Police Department. Website: http://www.cityofmonrovia.org/your-government/police-department/about-us/organization (accessed May 2, 2018).

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in an increased demand for police services in the City. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to police services, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(a) (iii). 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 facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for *schools*?

Hotel Development. The proposed Project does not include any residential uses. As described in Section 4.13, Population and Housing, the proposed Project would result in an increase of 22 to 26 part-time employees and 10 full-time employees on the Project site. Because of the general availability of local and regional labor, there would be an opportunity to hire local employees to fill the proposed Project's employment needs. It is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for 22 to 26 part-time and 10 full-time employees. Any increase in population associated with proposed Project would be limited and would not represent a substantial increase in the City's population. Therefore, it is not anticipated that that the proposed Project would result in a substantial increase in students within the Monrovia.

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. The Project Developer would be required to pay such fees to reduce any impacts of nonresidential development on school services as provided in Section 65995 of the California Government Code. Pursuant to the provisions of Government Code Section 65996, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, potential impacts to school services and facilities associated with implementation of the proposed Project would be less than significant, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for schools. Therefore, the proposed textual amendments to the LUE would not result in impacts related to schools. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include the introduction of any new land uses that would allow for new residential uses within the Crossroads District. Therefore, approval of the GPA would not result in impacts to schools, and no mitigation would be required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

(a) (iv). 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 facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Hotel Development. As discussed in Section 4.15, Recreation, the City currently owns and manages 33.3 acres of developed City parks, 80 acres of natural area at Canyon Park, and an additional 1,336 acres of natural lands in the Hillside Wilderness. The 33.3 acres of developed City parks currently provides 0.90 acre of park space per 1,000 residents. Adding the recreational value of Canyon Park's 80 acres and its proximity to the urban population, the City provides 3.05 acres per 1,000 people of public parkland in its park and open space system. The closest park to the Project site is the Julian Fisher Park, approximately 0.3 mile northeast of the Project site. Although it is possible that hotel guests and/or employees might use City parks, it is unlikely that the use of parks by project employees or guests would increase the use of those parks to a level that it would result in the need for new or physically altered facilities. Therefore, implementation of the proposed Project would result in a less than significant impact related to the provision of park space within the City, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for parks. Therefore, the proposed textual amendments to the LUE would not result in impacts related to parks. No mitigation would be required.

Approval of the proposed GPA is considered a planning/policy action, and it would not include physical improvements that would generate an increased use of existing neighborhood and regional parks or other recreational facilities. Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, approval of the GPA would result in less than significant impacts related to the increased use and deterioration of recreational facilities. Therefore, approval of the GPA would not result in impacts related to an increased demand for parks, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(a) (v). 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 facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other facilities?

Hotel Development. Employment opportunities created by the proposed Project would not directly result in significant population increases or substantially increase demand for libraries, schools, parks, or other such facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for government facilities. Therefore, the proposed textual amendments to the LUE would not result in impacts related to government facilities. No mitigation would be required.

As discussed previously in Section 4.13, Population and Housing, the proposed GPA would not directly induce new population growth in the area. Employment opportunities associated with new development allowed under the increased intensification of land uses included as part of the GPA would not directly result in significant population increases or substantially increase demand for libraries, schools, parks, or other such facilities. Therefore, approval of the GPA would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.15 RECREATION.

Would the Project:

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	☐	☐	☒	☐

Impact Analysis:

(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?

Hotel Development. As previously described in Section 4.14, Public Services, the City of Monrovia (City) currently maintains 33.3 acres of developed City parks, 80 acres of natural area at Canyon Park, and an additional 1,336 acres of natural lands in the Hillside Wilderness. The 33.3 acres of developed City parks currently provides 0.9 acre of park space per 1,000 residents.[35] Adding the recreational value of Canyon Park's 80 acres and its proximity to the urban population, the City provides 3.05 acres per 1,000 people of public parkland in its park and open space system. For comparison, the National Park standard is 3 acres of parkland per 1,000 residents.[36]

The proposed Project does not include any residential uses. As described in Section 4.13, Population and Housing, the proposed Project would result in an increase of 22 to 26 part-time and 10 full-time employees on the Project site. Because of the general availability of local and regional labor, there would be an opportunity to hire local employees to fill the proposed Project's employment needs. It is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for 22 to 26 part-time and 10 full-time employees. Any increase in population associated with proposed Project would be limited and would not represent a substantial increase in the City's population.

Although it is possible that hotel guest and employees might use City parks, it is unlikely that the use of parks by project employees or visitors would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities. Therefore, implementation of the proposed Project would result in a less than significant impact associated

[35] 113.3 acres/36,590 population=3.07 acres per 1,000 residents.

[36] This national standard established by the National Recreation and Parks Association (NRPA) dates to 1983 and only includes traditional parklands. The NRPA has recently suggested a broader-based definition of Parks and Open Space and has subsequently revised its standard to include approximately 10 acres per 1,000 residents, but suggests that each city look critically at its own resources and needs and open space definitions in establishing a local standard.

with increasing the usage of parks and recreational facilities in the City such that substantial deterioration of the facility would occur or be accelerated, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in an increased demand for parks or other recreational facilities. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the physical deterioration of parks or recreation facilities. No mitigation would be required.

Approval of the proposed General Plan Amendment (GPA) is considered a planning/policy action, and it would not include physical improvements that would generated an increased use of existing neighborhood and regional parks or other recreational facilities. Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, approval of the GPA would result in less than significant impacts related to the increased use and deterioration of recreational facilities, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(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?

Hotel Development. The proposed Project includes private recreational facilities (i.e., hotel pool and exercise room) for hotel guests only. No public recreational facilities are proposed as part of the Project. The analysis of adverse physical effects associated with the construction of the private recreational facilities included as part of the proposed Project has been incorporated into other portions of this IS/MND. Therefore, impacts related to the construction or expansion of recreational facilities included in the proposed Project would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. Refer to Response 4.15(a), above.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

4.16 TRANSPORTATION/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, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
(b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or 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 supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☒	☐	☐

Discussion:

The discussion and analysis provided in this section is based on the *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (TIA) (LSA, March 2018) (refer to Appendix I of this IS/MND).

Impact Analysis:

(a) Would the Project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Hotel Development.

Construction. Vehicle trips that would be generated on a daily basis throughout each phase of construction would derive from construction workers and delivery of construction materials. The construction phase with the highest construction trip generation would be grading. Based on preliminary construction operation estimates and preliminary grading plans, grading the

Project site would require approximately 2,016 cubic yards (cy) of fill. Assuming that trucks with a 14 cy capacity would be used during construction, approximately 144 trucks are anticipated to be required. Each of these trucks would make approximately two trips to deliver 2,016 cy of soil to the site (one arrival trip and one departure trip). During peak grading periods, the proposed Project construction is anticipated to generate up to 21 daily haul trucks (and 42 daily trips) that would be distributed throughout an 8-hour day. Assuming a passenger car equivalent (PCE) factor of 2.0 for haul trucks, 84 PCE construction trips are anticipated to be generated on a daily basis during this phase of Project construction, with approximately 11 PCE trips occurring each hour, during both the a.m. and the p.m. peak hours. The weekday a.m. peak period is 7:00 a.m. to 9:00 a.m. and the weekday p.m. peak period is 4:00 p.m. to 6:00 p.m. The majority of construction workers are anticipated to arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day.

As discussed in further detail below and shown in Table 4.16.C, Project build out would generate 891 daily trips (58 in the a.m. peak hour and 65 in the p.m. peak hour). The grading phase would generate fewer daily and peak-hour vehicle trips compared to the Project at build out. Because application of the City of Monrovia (City) General Plan Circulation Element (2012) methodologies for determining the significance of traffic impacts concluded that the impacts due to Project traffic at build out would be less than significant, it is reasonable to conclude that traffic impacts related to construction of the Project, which generates fewer trips, would also be less than significant.

All construction equipment would be staged on the Project site for the duration of the construction period. In addition, the proposed Project construction schedule would comply with the City's regulations pertaining to construction hours, which limit construction activities to the hours between 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. and 6 p.m. on weekends and holidays.[37]

For the reasons stated above, the Project would result in less than significant impacts related to potential conflicts with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. No mitigation would be required.

Operation. Roadway performance is most often controlled by the performance of intersections, specifically during peak traffic periods. This is because traffic control at intersections interrupts traffic flow that would otherwise be relatively unimpeded except for the influences of on-street parking, access to adjacent land uses, or other factors resulting in interaction of vehicles between intersections. For this reason, traffic analyses for individual projects typically focus on peak-hour operating conditions for key intersections rather than roadway segments. Operating conditions at intersections are typically described in terms of level of service (LOS). LOS is a measure of a roadway's operating performance and is a tool used in defining thresholds of significance. LOS is described with a letter designation from A to F, with LOS A representing the best operating conditions (free-flow traffic) and LOS F the worst (traffic jammed).

[37] City of Monrovia, Construction Hours. Website: http://www.cityofmonrovia.org/your-government/community-development/building/construction-hours. (accessed October 25, 2017).

Project-related traffic impacts were analyzed in the *Traffic Impact Analysis* prepared for the proposed Project (Appendix I). LOS was calculated using the intersection capacity utilization (ICU) methodology. The ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. The overall intersection ICU is then assigned an LOS value to describe intersection operations.

According to the City's General Plan Circulation Element (2012), LOS at an intersection is considered to be unsatisfactory when the ICU exceeds 0.90 (LOS D) within the City, except at locations where LOS F conditions currently exist.

Based on discussions with the City's Traffic Engineer, a project impact occurs when an intersection exceeds the acceptable LOS, or the impact of the development results in an increase of 0.04 or greater for LOS C, 0.03 or greater for LOS D, 0.02 or greater for LOE E, or 0.01 or greater for LOS F. Project mitigation would be required to return such intersections, or to the Baseline ICU if the Baseline ICU is greater than 0.90.

In addition to the ICU methodology of calculating signalized intersection LOS, the *Highway Capacity Manual* (HCM) (2010) methodology was used to determine the LOS at unsignalized study area intersections.[38] HCM 2010 unsignalized intersection methodology presents LOS in terms of control delay in seconds per vehicle. The resulting delay is expressed in terms of LOS, similar to the ICU methodology. A project impact at an unsignalized intersection occurs when the LOS changes from acceptable LOS (LOS A through D) to LOS E or F. Based on direction from the City Traffic Engineer, the Caltrans significant impact criteria specified in the *SANTEC/ITE Guidelines for Traffic Impact Studies in the San Diego Region* (March 2000) were used as Caltrans does not have adopted significant impact criteria. These criteria identify a significant impact at a Caltrans ramp intersection when the intersection operates at LOS D, E, or F, and the impact of the development results in an increase of at least 2.0 seconds of delay.

Table 4.16.A shows the LOS criteria for signalized and unsignalized intersections.

Table 4.16.A: Level of Service Criteria

LOS	Signalized ICU v/c ratio	Unsignalized HCM delay (seconds)
A	**0.00–0.60**	≤10.0
B	**> 0.61–0.70**	>10.0 and ≤15.0
C	**> 0.71–0.80**	>15.0 and ≤25.0
D	**> 0.81–0.90**	>25.0 and ≤35.0
E	**> 0.91–1.00**	>35.0 and ≤50.0
F	**> 1.00**	>50.0

Source: *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (LSA, March 2018) (refer to Appendix I of this IS/MND).
HCM = Highway Capacity Manual 2010
ICU = Intersection Capacity Utilization
LOS = level of service
v/c = volume-to-capacity ratio

[38] The intersection of I-210 eastbound ramps/Huntington Drive was analyzed using HCM 2000 methodology due to atypical geometrics and phasing at the intersection that are not compatible with HCM 2010 methodology.

Traffic impacts were analyzed at the following study area intersections:

1. Myrtle Avenue/Foothill Boulevard (signalized)
2. Myrtle Avenue/Huntington Drive (signalized)
3. Myrtle Avenue/Project Driveway 1 (unsignalized)
4. Myrtle Avenue/Central Avenue-Interstate-210 (I-210) westbound ramps (signalized)
5. Myrtle Avenue/Evergreen Avenue-I-210 eastbound ramps (signalized)
6. Myrtle Avenue/Duarte Road (signalized)
7. I-210 eastbound ramps/Huntington Drive (signalized)
8. I-210 westbound ramps/Huntington Drive (signalized)
9. Project Driveway 2/Huntington Drive (unsignalized)

These study area intersections were selected because they are closest to the Project site and, therefore, have the greatest potential to have traffic impacts related to the Project. Further away from the Project site, Project-related traffic disperses and the potential for significant traffic impact diminishes.

As required by the City, potential impacts were analyzed for the following traffic volume conditions:

- Existing Condition
- Existing Plus Project Condition
- Cumulative Year (2020) Condition
- Cumulative Year (2020) Plus Project Condition

Existing peak-hour traffic volumes were obtained from the City and National Data Surveying Services (NDS). The Cumulative (2020) (without Project) traffic volumes were estimated using a growth rate of 0.82 percent per year (a total of 1.64 percent) to existing traffic volumes. This growth rate was obtained from the Los Angeles County Congestion Management Plan (2010). A list of cumulative projects was provided by the City's Planning Department.

Weekday peak hour and daily traffic volumes for the proposed hotel development were estimated using trip rates published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (2012). As shown in Table 4.16.B, the proposed Project would generate 891 trips per day, including 58 a.m. peak-hour trips (34 inbound trips and 24 outbound trips) and 65 p.m. peak-hour trips (34 inbound trips and 31 outbound trips).

Table 4.16.C summarizes the results of the Existing and Existing Plus Project a.m. and p.m. peak-hour LOS analysis for the signalized study area intersections. As discussed previously, the ICU methodology was used to determine the LOS at signalized intersections. The results of the project driveways are provided in Response 4.16(d).

Table 4.16.B: Trip Generation Summary

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rate[1]									
Hotel		Rooms	8.17	0.31	0.22	0.53	0.31	0.29	0.60
Project Trip Generation									
Hotel	109	Rooms	891	34	24	58	34	31	65

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (TIA) (March 2018) (refer to Appendix I of this IS/MND).
ADT = average daily traffic

Table 4.16.C: Existing Baseline and Existing Plus Project LOS Summary

	Intersection	Existing				Plus Project				Peak-Hour Δ ICU/HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour				
		ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	AM	PM	
1	Myrtle Avenue/Foothill Boulevard	0.729	C	0.761	C	0.730	C	0.762	C	0.001	0.001	No
2	Myrtle Avenue/Huntington Drive	0.746	C	0.746	C	0.746	C	0.759	C	0.000	0.013	No
4	Myrtle Avenue/Central Avenue-I-210 WB ramps	0.763	C	0.864	D	0.766	C	0.867	D	0.003	0.003	No
5	Myrtle Avenue/Evergreen Avenue-I-210 EB ramps	0.662	B	0.823	D	0.666	B	0.828	D	0.004	0.005	No
6	Myrtle Avenue/Duarte Road	0.760	C	0.865	D	0.761	C	0.866	D	0.001	0.001	No
7	I-210 EB ramps/Huntington Drive	0.693	B	0.553	A	0.693	B	0.557	A	0.000	0.004	No
8	I-210 WB ramps/Huntington Drive	0.615	B	0.599	A	0.616	B	0.607	B	0.001	0.008	No

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (TIA) (March 2018) (refer to Appendix I of this IS/MND).
Note: If relevant, gray shading indicates values that exceed City of Monrovia's LOS criteria.
Δ = change
EB = eastbound
I-210 = Interstate 210
HCM = Highway Capacity Manual
ICU = intersection capacity utilization ratio
LOS = level of Service
WB = westbound

The intersection of Myrtle Avenue/Duarte Road operates concurrent with a Metro Gold Line train crossing at the north leg of the intersection. LSA staff observed the train crossing times on June 20, 2017, recording the duration of when the train crossing gates moved down to when the gates completely opened. The train was observed to add an approximately 20 percent delay to the intersection per hour (approximately 12 minutes per hour). The train crossing adds delay to only conflicting movements and partially overlaps with the standard intersection loss time of 10 percent per hour (approximately 6 minutes per hour). However, in order to present a conservative analysis, the train crossing loss time was analyzed to affect the entire intersection. This loss time percentage is calculated by adding the total train loss time to the standard intersection loss time, for a total of 30 percent, and is reflected in the intersection analysis for Myrtle Avenue/Duarte Road.

As illustrated by Table 4.16.C, all study area intersections currently operate at satisfactory LOS. The additional trips generated by the proposed Project would not result in a significant impact at any of the study area intersections for either of the Existing or Existing Plus Project

conditions. Therefore, the Project would not result in significant peak-hour intersection impacts in the Existing Plus Project condition.

As shown in Table 4.16.D, all study area intersections are anticipated to operate at satisfactory LOS during the cumulative (2020) Baseline setting, with the exception of Myrtle Avenue/Central Avenue-I-210 westbound ramps during the p.m. peak hour, Myrtle Avenue/Evergreen Avenue-I-210 eastbound ramps during the p.m. peak hour, and Myrtle Avenue/Duarte Road during the p.m. peak hour. With the addition of the Project in the cumulative Baseline setting, all study area intersections would continue to operate at satisfactory LOS, with the exception of the previously identified deficient intersections. The increase in ICU does not exceed the threshold of significance at any of the intersections. Therefore, the Project would not result in significant peak-hour intersection impacts in the Cumulative Plus Project condition, and no mitigation is required. The results of the project driveways are provided in Response 4.16(d).

Table 4.16.D: Cumulative Baseline and Cumulative Plus Project LOS Summary

Intersection		Cumulative				Plus Project				Peak-Hour Δ ICU/HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour				
		ICU/ HCM	LOS	ICU/ HCM	LOS	ICU/ HCM	LOS	ICU/ HCM	LOS	AM	PM	
1	Myrtle Avenue/ Foothill Boulevard	0.747	C	0.780	C	0.747	C	0.781	C	0.000	0.001	No
2	Myrtle Avenue/ Huntington Drive	0.856	D	0.835	D	0.865	D	0.847	D	0.009	0.012	No
4	Myrtle Avenue/ Central Avenue-I-210 WB ramps	0.862	D	0.911	E	0.864	D	0.913	E	0.002	0.002	No
5	Myrtle Avenue/ Evergreen Avenue-I-210 EB ramps	0.784	C	0.936	E	0.788	C	0.940	E	0.004	0.004	No
6	Myrtle Avenue/ Duarte Road	0.813	D	0.916	E	0.814	D	0.917	E	0.001	0.001	No
7	I-210 EB ramps/ Huntington Drive	0.721	C	0.593	A	0.721	C	0.597	A	0.000	0.004	No
8	I-210 WB ramps/ Huntington Drive	0.654	B	0.658	B	0.655	B	0.665	B	0.001	0.007	No

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
Note: If relevant, gray shading indicates values that exceed City of Monrovia's LOS criteria.
Δ = change
EB = eastbound
I-210 = Interstate 210
HCM = Highway Capacity Manual
ICU = intersection capacity utilization ratio
LOS = level of service
WB = westbound

Ramp Intersection Analysis. An Existing Plus Project HCM analysis was prepared as part of the *Traffic Impact Analysis* to demonstrate the effect that the Project would have on the Caltrans jurisdiction ramp intersections in the existing condition.

A summary of existing and plus Project ramp intersection LOS is presented in Table 4.16.E, which indicates that all study area intersections currently operate at satisfactory LOS during the a.m. and p.m. peak hours. With the addition of the Project in the existing setting, all study area intersections would continue to operate at satisfactory LOS. Therefore, Project implementation would result in less than peak-hour ramp intersection impacts, and no mitigation would be required.

Table 4.16.E: Existing Baseline and Existing Plus Project Ramp Intersection Summary

Intersection		Existing				Plus Project				Peak-Hour Δ HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour				
		HCM	LOS	HCM	LOS	HCM	LOS	HCM	LOS	AM	PM	
4	Myrtle Avenue/ Central Avenue-I-210 WB ramps	24.2	C	43.4	D	24.3	C	44.4	D	0.1	1.0	No
5	Myrtle Avenue/ Evergreen Avenue-I-210 EB ramps	23.6	C	32.3	C	24.0	C	33.2	C	0.4	0.9	No
7	I-210 EB ramps/ Huntington Drive	9.1	A	7.1	A	9.1	A	7.2	A	0.0	0.1	No
8	I-210 WB ramps/ Huntington Drive	10.1	B	12.6	B	10.2	B	12.7	B	0.1	0.1	No

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
Note: If relevant, gray shading indicates values that exceed City of Monrovia's LOS criteria.
Δ = change
EB = eastbound
HCM = Highway Capacity Manual delay (seconds per vehicle)
I-210 = Interstate 210
LOS = level of Service
WB = westbound

In addition, a Cumulative Plus Project HCM analysis was prepared to demonstrate the effect that the Project would have on the Caltrans jurisdiction ramp intersections in the cumulative (2020) condition.

A summary of cumulative and plus project ramp intersection LOS is presented in Table 4.16.F, which indicates that all study area intersections are projected to operate at satisfactory LOS, during the a.m. and p.m. peak hours, with the exception of Myrtle Avenue/Evergreen Avenue – I-210 eastbound ramps. With the addition of the Project in the cumulative setting, all study area intersections would continue to operate at satisfactory LOS, with the exception of the previously stated intersection. The Project does not exceed the City's threshold of significance, nor does it exceed the Caltrans significant impact criteria of 2 seconds of delay. Therefore, the Project can be implemented in the cumulative setting with no significant peak-hour ramp intersection impacts. No mitigation is required.

Summary. As outlined above, the proposed Project would not result in significant traffic impacts to any of the study area intersections or roadways segments in either the Existing Plus Project or Cumulative Project conditions. Therefore, the Project would not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. No mitigation is required.

Table 4.16.F: Cumulative Baseline and Cumulative Plus Project Ramp Intersection Summary

Intersection		Cumulative				Plus Project				Peak-Hour Δ HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour				
		HCM	LOS	HCM	LOS	HCM	LOS	HCM	LOS	AM	PM	
4	Myrtle Avenue/ Central Avenue-I-210 WB ramps	45.5	D	49.7	D	45.3	D	50.0	D	-0.2	0.3	No
5	Myrtle Avenue/ Evergreen Avenue-I-210 EB ramps	32.7	C	55.3	E	33.4	C	56.3	E	0.7	1.0	No
7	I-210 EB ramps/ Huntington Drive	9.7	A	8.1	A	9.8	A	8.2	A	0.1	0.1	No
8	I-210 WB ramps/ Huntington Drive	11.1	B	14.3	B	11.1	B	14.4	B	0.0	0.1	No

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
Note: If relevant, gray shading indicates values that exceed City of Monrovia's LOS criteria.
Δ = change
EB = eastbound
HCM = Highway Capacity Manual delay (seconds per vehicle)
I-210 = Interstate 210
LOS = level of Service
WB = westbound

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in increased traffic. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with applicable plans, ordinances, and or policies establishing measures of effectiveness for the performance of the City's circulation system. No mitigation would be required.

Although approval of the proposed General Plan Amendment (GPA) is considered a planning/policy action and would not include physical improvements that would generate traffic, the increased development potential in the Crossroads District as a result of the in floor-to-area ratio (FAR) from 0.75 to 2.0 would result in an increase in traffic. Specifically, because the level of building intensity has yet to be achieved under existing conditions, increased traffic would be generated under ultimate buildout conditions in the Crossroads District. Although no development at that intensity is proposed as part of the Project, the TIA analyzed the potential effects of ultimate buildout development for the Crossroads District for full disclosure purposes. A future 2035 roadway link analysis was performed consistent with the City's *General Plan Traffic Study* (2007).

Table 4.16.G shows the land use characteristics within the Crossroads District. To arrive at the buildout of 2.0 FAR, the total land area was multiplied by two. The allowable intensity is the total 2.0 FAR square footage subtracted by the existing land use intensity.

Table 4.16.G: Crossroads District Buildout Intensity

Crossroads District Block	Existing Land Use Intensity (sf)	Total Land Area (sf)	2.0 FAR Intensity (sf)	Crossroads District Allowable Buildout Intensity (sf)
Northwest Block	105,792	186,186	372,372	266,580
Northeast Block	87,312	187,843	375,686	288,374
Southwest Block	1,989	99,061	198,122	196,133
Southeast Block	62,946	174,424	348,848	285,902

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
FAR = floor-to-area ratio
sf = square foot/feet

Trip generation for the Crossroads District (shown in Table 4.16.H) was based on daily and peak-hour trip rates from the ITE *Trip Generation Manual*, 9th Edition (2012).[39] The land use for generating trips is General Office, as this land use type reflects existing and the likely type of development in the Crossroads District. As illustrated in Table 4.16.H, the buildout of the allowable intensity of the Crossroads District is anticipated to generate 11,435 trips per day.

Table 4.16.H: Crossroads District Trip Generation Summary

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rate[1]									
Office		TSF	11.03	1.37	0.19	1.56	0.25	1.24	1.49
Crossroads District Trip Generation									
Office	1,036.689	TSF	11,435	1,423	194	1,617	263	1,282	1,545

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
[1] The trip rate (i.e., Land Use Code [710] – Office) was referenced from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 9th Edition (2012).
ADT = average daily traffic
TSF = thousand square feet

The General Plan Build Out (2035) Conditions were analyzed using the existing roadway segment lane geometrics, which are also consistent with the minimum General Plan designations. The roadway segment average daily traffic (ADT) counts for the study area roadways were provided by the City Engineer. The regional ambient growth rate (8.1 percent, 0.45 per year for 18 years) and traffic volumes from cumulative projects utilized in the Cumulative Plus Project (2020) Condition were applied to the existing roadway segment ADT in order to arrive at forecast 2035 conditions. Both the Future Year 2035 and the Future Year 2035 with the Crossroads District

[39] The ITE 9th Edition hotel trip generation rates are higher than the 10th Edition trip generation rates for the a.m. peak hour. The p.m. peak hour hotel trip generation rates are the same in both the 9th and 10th Editions. The 10th Edition ADT rates are higher than the 9th Edition rates by 0.19 (9th Edition = 8.17; 10th Edition = 8.36). Therefore, the 9th Edition trip generation rate is more conservative than the 10th Edition trip generation rate for the City of Monrovia, and as such, was used for this analysis.

Buildout have been compared to the capacity of the existing roadway configurations, and also the minimum General Plan designations. Table 4.16.I presents the findings for the Future Year 2035 scenarios.

Table 4.16.I: Future Year 2035 with Crossroads District Recommended Improvements

Segment #	Roadway	Segment	Capacity[1]	Future Year 2035 with Crossroads District			Capacity[1] with Recommended Improvements	Future Year 2035 with Crossroads District with Recommended Improvements			Δ v/c Ratio
				ADT[2]	v/c Ratio	LOS		ADT[2]	v/c Ratio	LOS	
5	Huntington Drive	I-210 WB ramps to Myrtle	36,000	34,800	0.97	E	54,000	34,800	0.64	B	-0.330
10	Evergreen Avenue	Myrtle to California	18,000	19,200	1.07	F	27,000	19,200	0.71	C	-0.360

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (TIA) (March 2018) (refer to Appendix I of this IS/MND).
Note: Gray shading indicates values that exceed the City of Monrovia's LOS criteria.
[1] Average daily traffic roadway segment capacity is determined as 9,000 vehicles per lane, per the City of Monrovia's *General Plan Circulation Element* (2012).
[2] Average daily traffic volume is displayed with rounding to the nearest hundreds digit. However, the v/c ratio is calculated using the precise volume.
Δ = change
ADT = average daily traffic
I-210 = Interstate 210
LOS = level of service
v/c = volume-to-capacity
WB = westbound

As shown in Table 4.16.I, with the addition of traffic generated as a result of the increase in FAR within the Crossroads District, the segments of Huntington Drive between the I-210 westbound ramps and Myrtle Avenue and Evergreen Avenue east of Myrtle Avenue are projected to exceed the City's threshold in the Future Year 2035.

As stated in the General Plan Circulation Element Policy 2.1, Huntington Drive is anticipated to require lane reconfiguration from the existing four-through-lane Primary Arterial to a six-through-lane Primary Arterial to provide additional capacity during peak periods and throughout the day. Therefore, the roadway segment of Huntington Drive is recommended to be reconfigured to provide six through lanes between the I-210 eastbound ramps and Myrtle Avenue in the Future Year 2035 horizon when all four corners of the intersection of Myrtle Avenue/Huntington Drive achieve the 2.0 FAR intensity.

In addition, the eastbound travel lanes along the roadway segment of Evergreen Avenue are recommended to be reconfigured to a three-through-lane Collector Street lane between Myrtle Avenue and the I-210 eastbound on-ramp. This reconfiguration is consistent with the overall cross-section shown in Figure III-1 of the General Plan Circulation Element. This may require spot widening adjacent to the I-210 ramps and/or elimination of on-street parking along Evergreen Avenue in the Future Year 2035 Condition when all four corners achieve the 2.0 FAR intensity. These reconfigurations are consistent with the existing General Plan Circulation Element designations for the roadway segments.

As shown in Table 4.16.I, all roadway segments within the study area would operate at satisfactory LOS with recommended reconfigurations incorporated.

Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. As part of this review, traffic studies should be conducted to determine the timing of any necessary reconfigurations. Therefore, approval of the GPA would result in less than significant impacts related to conflicts with applicable plans, ordinances, and or policies establishing measures of effectiveness for the performance of the City's circulation system, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project 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?

Hotel Development. The Los Angeles County Metropolitan Transportation Authority (Metro) adopted the current Congestion Management Program (CMP) in 2010. The 2010 CMP is the eighth CMP adopted for Los Angeles County since the requirement became effective with the passage of Proposition 111 in 1990. This CMP establishes LOS standards for roadway intersections in the County. LOS E is the established standard in Los Angeles County except where the base year LOS is worse than LOS E. The nearest CMP monitoring locations to the Project site are in the City of Pasadena (along the I-210 at the intersection of Rosemead Boulevard/Foothill Boulevard) and in the City of Azusa (intersections of Azusa Avenue and Foothill Boulevard and San Gabriel Avenue/Foothill Boulevard). Due to the distance of these intersections from the Project site (i.e., approximately 4 miles west and 5 miles east of the property, respectively), traffic associated with the proposed Project is not anticipated to affect these CMP intersections. Therefore, the proposed Project would not result in conflicts with the County's 2010 CMP, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in increased traffic. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with the County's 2010 CMP. No mitigation would be required.

As previously stated, future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. As part of this review, traffic studies should be conducted to determine potential impacts to CMP intersections. Therefore, approval of the

GPA would result in less than significant impacts related to conflicts with the County's 2010 CMP, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(c) Would the Project 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?

Hotel Development. The nearest airport to the Project site is the El Monte Airport, which is located approximately 3.8 miles southwest of the Project site in the City of El Monte. Therefore, development of the proposed Project would not result in impacts related to changes in air traffic patterns that could result in substantial safety risks. No mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City, and as such, would not result in changes to air traffic patterns. Therefore, the proposed textual amendments to the LUE would not result in impacts related to changes in air traffic patterns that could result in substantial safety risks. No mitigation would be required.

Although the proposed GPA to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the proposed GPA is considered a policy/planning action and would not include any physical improvements within the vicinity of an airport that could result in changes to air traffic patterns. Therefore, future individual projects resulting from approval of the GPA would not result in impacts related to changes in air traffic patterns that could result in substantial safety risks. No mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Hotel Development. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that serve the Project site area. Access to the Project site would be provided by a right-in-right-out driveway along Huntington Drive and a full-access driveway along Myrtle Avenue. An access analysis was prepared utilizing HCM-based intersection metrics as part of the *Traffic Impact Analysis* for the Project in an effort to evaluate the adequacy and performance of these two driveways.

Table 4.16.J presents a summary of the driveway LOS for the Existing Plus Project and Cumulative Plus Project conditions. As shown in Table 4.16.J, both driveways are anticipated to operate at satisfactory LOS during the a.m. and p.m. peak-hour periods in both the Existing Plus Project and Cumulative Plus Project conditions.

Table 4.16.J: Access Analysis

Intersection		Existing Plus Project				Cumulative Plus Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS
3	Myrtle Avenue/Project Driveway 1	18.2	C	24.0	C	22.8	C	30.7	D
9	Project Driveway 2/ Huntington Drive	10.3	B	14.3	B	10.7	B	15.6	C

Source: LSA. *Traffic Impact Analysis for the Monrovia Hotel, Monrovia Hotel, Los Angeles County, California* (March 2018) (refer to Appendix I of this IS/MND).
LOS = level of service
NBL = northbound left

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in safety hazards associated with design features or incompatible uses. Therefore, the proposed textual amendments to the LUE would not result in impacts related to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). No mitigation would be required.

Approval of the proposed GPA is considered a planning/policy action, and it would not include physical improvements that would result in hazards due to design features or incompatible uses. Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. As part of this review, traffic studies should be conducted to determine potential impacts associated with hazards caused by design hazards and/or incompatible uses. Therefore, approval of the GPA would result in less than significant impacts related to design features (e.g., sharp curves or dangerous intersections) and/or incompatible uses (e.g., farm equipment), and no mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(e) Would the Project result in inadequate emergency access?

Hotel Development.

Construction. As discussed in Response 4.8(g), the proposed Project would require temporary lane closures on West Huntington Drive and South Myrtle Avenue to accommodate utility improvements. Temporary lane closures would be implemented consistent with the

recommendations of the *California Joint Utility Traffic Control Manual*. Among other things, the manual recommends early coordination with affected agencies to ensure that emergency vehicle access is maintained. In this manner, officials could plan and respond appropriately in the event emergency vehicles would be required to access West Huntington Drive or South Myrtle Avenue. In addition, as described in Mitigation Measure HAZ-2, the Project Developer would be required to prepare and implement a Construction Staging and Traffic Management Plan, which would be subject to the approval of the Director of the City of Monrovia Department of Public Services, or designee. The Construction Staging and Traffic Management Plan would require certain conditions (e.g., providing warning signs, lights, and devices) and would also require that the City of Monrovia Police Department be notified a minimum of 24 hours in advance of any lane closures or roadway work, including closures required to accommodate proposed utility connections. Therefore, with implementation of Mitigation Measures HAZ-2, impacts to emergency access during construction would be reduced to a less than significant level. No additional mitigation is required.

Operation. As discussed in Section 2.0, Environmental Setting and Project Description, emergency vehicles would be able to enter and exit the Project site via the access points off West Huntington Drive and South Myrtle Avenue. All Project driveways will be constructed to meet City of Monrovia driveway design standards. Therefore, implementation of the proposed Project would not result in inadequate emergency access, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in inadequate emergency access. Therefore, the proposed textual amendments to the LUE would not result in impacts related to emergency access. No mitigation would be required.

Approval of the proposed GPA is considered a planning/policy action, and it would not include physical improvements that would result in impacts associated with inadequate emergency access. Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. As part of this review, traffic studies should be conducted to determine potential impacts associated with inadequate emergency access. Therefore, approval of the GPA would result in less than significant impacts related to inadequate emergency access, and no mitigation is required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measure HAZ-2.

Level of Significance after Mitigation: Less Than Significant

(f) Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Hotel Development. The Project would not affect adopted policies supporting alternative transportation and would be subject to compliance with policies, plans, and programs of the City and other applicable agencies regarding alternative modes of transportation. Pedestrians accessing the Project may use existing pedestrian facilities (e.g., sidewalks and crosswalks) that are part of the surrounding street system. The Project would also provide a system of pedestrian pathways within the Project site to facilitate pedestrian movement through the parking lot. Safe access to the public street system (via West Huntington Drive and South Myrtle Avenue) would be provided. Additionally, the Project would include bicycle racks near the entrance to the hotel building, which would serve to provide convenient bicycle access to the site and would promote access for alternate modes of transportation to access the site.

Transit facilities are accessible from the Project site within a 0.50-mile radius. In the immediate vicinity, Foothill Transit bus stops are provided at the South Primrose Avenue/Huntington Drive (Line 270), Huntington Drive/Myrtle Avenue West (Lines 187 and 270), Huntington Drive/Myrtle Avenue East (Lines 187 and 494), and Myrtle Avenue/Cypress Avenue (Lines 270 and 494). Approximately ten additional bus stops are located within the 0.50-mile radius. These bus routes provide transportation to Montclair, Claremont, Glendora, Pasadena, Arcadia, El Monte, San Dimas, and Duarte. Additionally, the Project site is located approximately 0.55 mile northeast of the Metro Gold Line Station. The Project site and the train station are accessible via sidewalk and crosswalk connections. The Metro Gold Line provides transportation from Azusa to East Los Angeles via downtown Los Angeles. The Project would not remove or relocate any alternative transportation access points.

As discussed in Section 4.8(g), the proposed Project would require temporary lane closures on West Huntington Drive and South Myrtle Avenue to accommodate utility improvements. Temporary lane closures would be implemented consistent with the recommendations of the *California Joint Utility Traffic Control Manual,* which recommends that the needs of operators of commercial vehicles such as buses be assessed and appropriate coordination and accommodations made. In addition, as described in Mitigation Measure HAZ-2, the Project Developer would be required to prepare and implement a Construction Staging and Traffic Management Plan, which would be subject to the approval of the Director of the City of Monrovia Department of Public Services, or designee. The Construction Staging and Traffic Management Plan would require that Foothill Transit be provided with advance notice of any temporary lane closures that could necessitate detours in order to ensure that bus service is maintained in vicinity of the Project site. Additionally, the Construction Staging and Traffic Management Plan would identify pedestrian routes from the construction site (i.e., the Project site) to adjacent sidewalks and walkways to ensure pedestrian safety during Project construction. With implementation of Mitigation Measure HAZ-2, potential temporary disruptions to transit service would be minimized. Therefore, the Project does not conflict with adopted plans, policies, or programs supporting alternative transportation, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in conflicts with plans regarding public transit, bicycle, or pedestrian facilities. Therefore, the proposed textual amendments to the LUE would not result in impacts related to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). No mitigation would be required.

Approval of the proposed GPA is considered a planning/policy action, and it would not include physical improvements that would result in impacts associated with conflicts with plans, policies, or programs supporting alternative transportation. Future individual projects resulting from the approval of the GPA would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, approval of the GPA would result in less than significant impacts related to conflicts with plans, policies, or programs supporting alternative transportation, and no mitigation is required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measure HAZ-2.

Level of Significance after Mitigation: Less Than Significant Impact

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 California 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)	☐	☒	☐	☐
(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) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource 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) Would the Project cause a substantial adverse change in the significance of 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?

Hotel Development. The following responses address the thresholds in 4.17(a) and 4.17(b).

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires that Lead Agencies evaluate a Project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside of the definition stated above nonetheless qualifies as a "tribal cultural resource."

Also per AB 52 (specifically Public Resources Code [PRC] 21080.3.1), a CEQA Lead Agency must consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project and have previously requested that the Lead Agency provide the tribe with notice of such projects.

The City currently maintains a list of tribal councils based on a list of councils and corresponding Native American representatives provided to the City by the Native American Heritage Commission (NAHC) on September 8, 2016. This includes the following Tribal representatives:

- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino Tongva Tribe, Linda Candelaria, Co-Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- San Fernando Band of Mission Indians– John Valenzuela, Chairperson

The City sent letters for the purposes of Senate Bill (SB) 18[40] in April 2016 and AB 52 consultation to all of the people listed above in November 2016.

In a letter dated November 10, 2016 (Appendix J), Mr. Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation, requested AB 52 consultation with the City regarding the proposed Project. Mr. Salas stated that the Project lies within the ancestral territories of the Kizh Gabrieleno, and requested that a certified Native American monitor from that group be present during any and all ground-disturbing activities. Mr. Salas also suggested the City contact him to conduct consultation by phone or face-to-face meeting. The City attempted to follow up with Mr. Sallas with an email on November 10, 2016, and several subsequent phone calls; however, no response was received.

As discussed in Response 4.5(a), the Project site does not contain any "historical resources" as defined by the CEQA. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines* or PRC 5020.1(k).

As discussed in Response 4.5(b), the Archaeological Resources Assessment concluded that there is potential for subsurface archaeological deposits below the Artificial Fill on the site (occurring to a depth of 7 feet (ft.) below ground surface [bgs]) in the Young Alluvial Fan Deposits to a depth of approximately 10 ft. Consequently, Mitigation Measure CUL-1 requires that an archaeological monitor be on site during ground-disturbing activities to monitor for buried prehistoric or historic material when excavation occurs in previously undisturbed native soil (i.e., Young Alluvial Fan Deposits) from a depth of approximately 7 ft. bgs to 10 ft. bgs. Monitoring would not be necessary when excavation occurs in Artificial Fill. Implementation of Mitigation Measure CUL-1 would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

[40] Senate Bill 18 (Chapter 905, Statutes of 2004) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan, or designating land as open space.

As noted above, Mr. Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation, stated that the Project site lies within the ancestral territories of the Kizh Gabrieleno, and requested that a certified Native American monitor from that group be present during all ground-disturbing activities. No evidence that the proposed Project would result in a substantial adverse change in the significance of a tribal cultural resource (defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is listed or eligible for listing in the California Register, or in a local register of historical resources as defined in PRC Section 5020.1(k)) was presented in this letter. However, the City agreed to require Native American monitoring during ground-disturbing activities in native soils (at depths between 7 ft. and 10 ft. bgs) to address potential impacts associated with buried or undiscovered tribal cultural resources that may exist in previously undisturbed native soil. Although no evidence of cultural resources has been provided by the tribes consulted, Mitigation Measure TCR-1 would require the presence of a Native American monitor during ground-disturbing activities, as requested in the letter received by the City from Mr. Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation. Implementation of Mitigation Measure TCR-1 would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns in the City that could result in impacts to tribal cultural resources. Therefore, the proposed textual amendments to the LUE would not result in impacts related to tribal cultural resources. No mitigation would be required.

Approval of the proposed GPA is considered a planning/policy action, and it would not include physical improvements that could impact tribal cultural resources. Future individual projects resulting from the approval of the GPA would be subject to applicable provisions of AB 52 and/or SB 18, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, approval of the GPA would result in less than significant impacts related to tribal cultural resources, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measure:

TCR-1 **Tribal Cultural Resources: Monitoring Procedures.** Prior to commencement of any ground-disturbing activities, the Project Developer shall present evidence to the Director of the City of Monrovia Community Department, or designee, that a qualified Native American monitor has been retained to provide Native American monitoring services during ground-disturbing activities at depths between 7 and 10 feet (ft.) below ground surface (bgs). The Native American monitor shall be selected by the Project Developer from the list of certified Native American monitors maintained by the Gabrieleno Band of Mission

Indians – Kizh Nation. The Native American monitor shall be present at the pre-grading conference to establish procedures for tribal cultural resource surveillance. Those procedures shall include provisions for temporarily halting or redirecting work to permit sampling, identification, and evaluation of resources deemed by the Native American monitor to be tribal cultural resources as defined in Public Resources Code Section 21074. In the event that human remains are encountered on the site and are determined to be of Native American origin, the Project Developer would be required to comply with applicable provisions in Mitigation Measure CUL-3 included in this Initial Study/Mitigated Negative Declaration. These procedures shall be reviewed and approved by the City of Monrovia Community Department Director, or designee, prior to commencement of any surface disturbance on the Project site.

Significance Determination after Mitigation: Less Than Significant

4.18 UTILITIES/SERVICE SYSTEMS.

Would the Project:

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 or collection 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 insufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	☒	☐
(g)	Comply with federal, state, and local statutes and regulations related to solid wastes.	☐	☐	☒	☐

Discussion:

The discussion and analysis provided in this section is based on the *Sewer Capacity Analysis-Monrovia Hotel* (Sewer Capacity Analysis) (David Evans and Associates; January 8, 2018) and the *Water Capacity Study for the Proposed Hotel (Huntington and Myrtle)* (Water Capacity Study) (Stetson Engineers, Inc.; January 18, 2018) (refer to Appendix K of this IS/MND).

Impact Analysis:

(a) Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Hotel Development. Local governments and water districts are responsible for complying with federal regulations, both for wastewater plant operation and the collection systems (e.g., sanitary sewers) that convey wastewater to the wastewater treatment facility. Proper operation and maintenance is critical for sewage collection and treatment because impacts from these processes can degrade water resources and affect human health. For these reasons, publicly owned treatment works (POTWs) receive Waste Discharge Requirements (WDRs) to ensure that such wastewater facilities operate in compliance with the water quality regulations set forth by the State. WDRs, issued by the State, establish effluent limits on the kinds and quantities of pollutants that POTWs can discharge. These permits also contain pollutant monitoring, record-

keeping, and reporting requirements. Each POTW that intends to discharge into the nation's waters must obtain a WDR prior to initiating its discharge.

The proposed Project would be required to connect to the City of Monrovia's (City) public wastewater collection system, which ties into regional trunk sewers operated by the Sanitation Districts of Los Angeles County (LACSD). Wastewater entering the LACSD regional trunk sewer lines is delivered to one or more water reclamation plants owned by LACSD for collection, treatment, and disposal. LACSD is a public agency created under State law to manage wastewater and solid waste on a regional scale. LACSD consists of 24 independent special districts serving about 5.5 million people in Los Angeles County, with a service area covering approximately 824 square miles and encompassing 78 cities and unincorporated territory. Currently, the wastewater system includes approximately 1,400 miles of sewers, 48 active pumping plants, and 11 wastewater treatment plants that transport and treat about half the wastewater in the County.[41]

The ~~majority of the~~ wastewater generated by the City~~'s wastewater~~ is ~~diverted to~~ treated at the San Jose Creek Water Reclamation Plant (SJCWRP), which has a treatment capacity of 100 mgd and currently processes an average of 64.7 mgd. All biosolids and wastewater flows that exceed the capacity of the SJCWRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson. ~~the Whittier Narrows Water Reclamation Plant (WNWRP), and the Los Coyotes Water Reclamation Plant (Los Coyotes WRP).[42] These facilities are responsible for the treatment and disposal of wastewater.~~ Because these reclamation plants are considered POTWs, operational discharge flows treated at these plants would be required to comply with applicable WDRs issued by the Los Angeles RWQCB. Compliance with conditions or permit requirements established by the Los Angeles RWQCB WDRs would ensure that wastewater discharges from the Project site and treated by the wastewater treatment facility system would not exceed applicable Los Angeles RWQCB wastewater treatment requirements. In addition, as discussed in Response 4.18(b), the proposed Project is anticipated to generate approximately 13,625 gallons per day (gpd) of wastewater,[43] which is approximately 0.04 percent of the available daily treatment capacity at the ~~three~~ treatment plant~~s~~ serving the City. Therefore, the increased wastewater flows from the proposed Project can be accommodated within the existing design capacity of the existing wastewater treatment facilities and would not result in the wastewater treatment facilities exceeding the wastewater treatment requirements established by the Los Angeles RWQCB. Therefore, impacts related to wastewater treatment requirements would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such,

41 Sanitation Districts of Los Angeles County (LACSD). Wastewater Collection Systems. Website: http://www.lacsd. org/ wastewater/wwfacilities/wcs.asp (accessed February 8, 2017).

42 LACSD. Joint Outfall System Water Reclamation Plants. Website: http://www.lacsd.org/wastewater/ wwfacilities/joint_outfall_system_wrp/default.asp (accessed February 8, 2017).

43 LACSD. Loadings for Each Class of Land Use, Table 1. Website: http://www.lacsd.org/civicax/filebank/ blobdload.aspx?blobid=3531 (accessed August 24, 2017).

Although the proposed General Plan Amendment (GPA) to the City's General Plan Land Use Element (LUE) would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA would not exceed wastewater treatment requirements of the Los Angeles RWQCB. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the exceedance of wastewater treatment requirements, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(b) Would the Project require or result in the construction of new water or wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Hotel Development.

Water Supply. The City of Monrovia is a sub-agency of Upper San Gabriel Valley Municipal Water District (Upper District), a wholesale water agency. The City's Utility Division is the retail water supplier for the City. The City delivers potable water through a pressurized distribution system, which consists of 111 miles of piping. The City's water supply system consists of groundwater obtained from five active wells with a combined capacity of 14.4 million gallons per day (mgd), 18 booster pumps, 7 pressure zones, 2 water treatment facilities, and 12 reservoirs with a combined storage capacity of approximately 25 million gallons.[44, 45] The City currently maintains a standby emergency connection to the Metropolitan Water District of Southern California, which is capable of delivering up to 9 mgd of potable water. The City also maintains an emergency connection to receive water from the California American Water Company-Duarte District.[46]

The City does not use surface water, stormwater, or reclaimed water. Rather, the City relies on groundwater as its primary source of water. The City currently obtains 6,229 acre-feet per year (af/yr) from the five groundwater wells into the Main Basin. The Main Basin is managed by the Main Basin Watermaster, a nine-person board appointed by the Los Angeles County Superior Court. Water from the Main Basin is adjudicated to several parties/adjacencies, including the City. The adjudication of groundwater from the Main Basin assists in defining natural safe groundwater yields, specifying annual pumping rights, allowing for the one-year carry over of

[44] City of Monrovia. Water System. Website: http://www.cityofmonrovia.org/your-government/public-works/water (accessed August 24, 2017).

[45] Stetson Engineers, Inc. *Water Capacity Study for the Proposed Hotel (Huntington and Myrtle.* January 18, 2018.

[46] City of Monrovia. 2016. *2015 Urban Water Management Plan*. May. Website: http://www.cityofmonrovia.org/home/showdocument?id=884 (accessed August 24, 2017).

unused water rights, prohibiting unauthorized recharge into the Main Basin, and restricting the export of groundwater. Although there is no limit on the quantity of water that may be extracted from parties to the Main Basin Adjudication, groundwater extraction in excess of a party's water right or proportional share of the Operating Safe Yield[47] requires purchase of imported replacement water to assist in recharging the Main Basin. The City holds diversion rights for 1,098 acre-feet per year (af/yr), a pumping right of 6,116 af/yr, and a pumper's share of approximately 3 percent of the Operating Safe Yield. In the event that the City pumps more groundwater than allowed, replacement water may be purchased from the Upper District to recharge the Main Basin.

The City's water supply system provides reliable service to a population of nearly 36,950 within the service area. According to the City's 2015 Urban Water Management Plan (UWMP), the City consumed approximately 6,229 af in 2015, and the projected water demand for 2020 will be 6,635 af/yr. The City's total water demand projections are based on water use targets stipulated by the Water Conservation Act of 2009 and projected population data from the Southern California Association of Governments (SCAG). The UWMP includes projected water demand for specific water use sectors include single-family residential, multi-family residential, commercial, industrial, landscape, institutional and governmental, and distribution system losses. According to the 2015 UWMP, the City's water supplies are projected to meet full service demands through the year 2040.

Short-term demand for water may occur during construction activities on site. Water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be temporary and would cease at Project build out. Water use during construction Overall, demolition and construction activities require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. Therefore, potential project impacts associated with short-term construction activities would be less than significant.

As shown in Table 4.18.A, the proposed Project would develop a currently vacant site with a 109-room hotel, which would result in a projected water demand of 5,450 gpd (6.1 af annually). As is required of all new development in California, the proposed Project would comply with California State law regarding water conservation measures, including pertinent provisions of Title 24 of the California Government Code (Title 24) regarding the use of water-efficient appliances and low-flow plumbing fixtures.

Because the City's service area is nearly built out, new development is primarily related to infill and denser use of lands. These new infill and increased density projects will replace vacant, low-density, commercial, and residential areas. In the existing condition, the Project is designated and zoned Business Enterprise (BE) indicating that the City would have assumed future development of the site in the land use projections used to develop the UWMP. The estimated increase in water demand associated with new development proposed as part of the Project

[47] "Operating Safe Yield" is established by the Water master to allocate to each Party its portion of groundwater that can be produced from the Main Basin without a Replacement Water Assessment.

Table 4.18.A: Water Demand and Wastewater Generation Rates

Land Use Type	Generation Rate	Proposed Project	Total Per Day
Wastewater Generation			
Hotel	125 gallons per room per day [1]	109 rooms	13,625 gallons
Water Demand			
Hotel	50 gallons per room per day	109 rooms	5,450 gallons

[1] LACSD, Table 1-Loadings for Each Class of Land Use. Website: http://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531 (accessed August 24, 2017).

[2] Water Capacity Study (Appendix K).

would represent 0.09 percent of the City's projected water demand in 2020. Therefore, the increased water demand resulting from the Project is anticipated to be minimal and would be within the existing service capacity of the City. As such, the proposed Project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water. Therefore, Project impacts associated with an increase in potable water demand are considered less than significant, and no mitigation is required.

Water Distribution. According to the Water Capacity Study Technical Memorandum prepared for the proposed Project (Appendix K), the proposed Project would be required to connect to a minimum 8-inch pipe in a high-pressure zone (Zone 2) to ensure the provision of water to the Project site and to meet applicable fire flow requirements. As discussed in the Project Description and the Water Capacity Study, the proposed Project includes the installation of an on-site water distribution system and installation of a new water main. The proposed water main would extend from near the intersection of Primrose Avenue and Huntington Drive, east on Huntington Drive (north side of right of way) until such line reaches a point near the project. The water main extension would then terminate. The water main is not intended to serve any other development.

The Project also includes the installation of a hydrant lateral, a fire line lateral, and a service lateral that would extend to the south side of the Project site. The Project requires a MFRD connection, which requires installation of a hydrant within 100 feet (ft.) of the Project site.

Construction of the water main would result in temporary off-site lane closures. The Project Developer would be required to prepare and implement a Construction Staging and Traffic Management Plan (Mitigation Measure HAZ-2), which would be subject to the approval of the Director of the City of Monrovia Public Services, or designee. The Construction Staging and Traffic Management Plan would require certain conditions (i.e., providing warning signs, lights, and devices) and would also require that the City of Monrovia Police Department be notified a minimum of 24 hours in advance of any lane closures or roadway work (such as that required for the utility line extensions). Implementation of Mitigation Measure HAZ-2 would minimize impacts to the surrounding street system during construction of the water main. In addition, the proposed Project would be required to implement applicable dust control requirements from SCAQMD.

According to the Water Capacity Study, with the installation of the water main, the City's water system would have adequate capacity to provide service water to the Project and meet applicable fire flow requirements.

Therefore, the proposed Project would result in less than significant impacts with respect to the construction of new water facilities or expansion of existing facilities, and no mitigation would be required.

Wastewater. As previously stated, LACSD is the agency responsible for sewer facilities in the City. LACSD owns and operates approximately 1,400 miles of sewers, 48 active pumping plants, and 11 wastewater treatment plants that transport and treat about 500 mgd of wastewater.[48] The LACSD's service area includes sewer systems located within the Joint Outfall System (JOS). In addition to Monrovia, the JOS includes 73 cities and unincorporated territory in Los Angeles County. The system provides wastewater collection, treatment, reuse, and disposal for residential, commercial, and industrial users.

Wastewater generated by the City of Monrovia is treated by LACSD's SJCWRP~~, WNWRP, and Joint Water Pollution Control Plant (JWPCP)~~ plant~~s~~. The SJCWRP, which is located adjacent to the City of Industry, has a design capacity of 100 mgd and processes an average flow of 64.7 ~~53.8~~ mgd. All biosolids and wastewater flows that exceed the capacity of the SJCWRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson. ~~The WNWRP, which is located near the City of South El Monte, has a design capacity of 15 mgd and processes and average flow of 7.3 mgd. The Los Coyotes WRP, which is located in the City of Cerritos, has a design capacity of 37.5 mgd and processes and average flow of 20.4 mgd.~~[49] ~~Therefore, the total combined remaining treatment capacity of the SJCWRP, WNWRP, Los Coyotes WRP is 71 mgd.~~

The proposed Project would develop the currently vacant site with a 109-room hotel. Based on wastewater generation rates for hotel uses established by LACSD, operation of the Project is anticipated to generate approximately 13,625 gpd of wastewater,[50] which is approximately 0.04 percent of the available daily treatment capacity at the SJCWRP ~~three treatment plants. All three plants are in compliance with the Los Angeles RWQCB's treatment requirements and have the capacity to accommodate the increased wastewater flows from the proposed Project.~~

The proposed Project would connect to an existing City-owned 8-inch sewer main in Myrtle Avenue, south of Huntington Drive through a new 6-inch sewer lateral. According to LACSD, for sewer mainlines less than 15-inches in diameter, the capacity is considered full when the ratio of depth to flow is equal to 0.5. Under existing flow conditions, the existing depth to flow in the existing City-owned 8-inch sewer main is 0.61 with a predicted flow of 0.288 mgd in the pipe

48 City of Monrovia. 2008. *General Plan Environmental Impact Report for the Proposed Land Use and Circulation Elements.*

49 ~~LACSD. Revenue Program Report. November 2007 (updated March 2017). Website: http://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=13317 (accessed August 23, 2017).~~

50 LACSD. Loadings for Each Class of Land Use, Table 1. Website: http://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531 (accessed August 24, 2017).

indicates that this segment of the 8-inch sewer main is over capacity in the existing pre-Project condition.

The proposed Project would contribute a 5 percent increase in wastewater flows to the City-owned 8-inch sewer main. As such, the proposed Project would contribute to an existing deficiency and would result in the need for new or expanded wastewater facilities. As such, the Project Developer would be required to comply with Mitigation Measure ULT-1. Mitigation Measure ULT-1 requires the Developer to contribute a "fair-share" portion of the total costs for the City to implement sewer line improvements to pipe segments 173-029 to 172-010. The proposed Project would also pay any required sewer connection fees. Therefore, implementation of Mitigation Measure ULT-1 would reduce Project impacts related to construction or expansion of wastewater treatment facilities to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in an increased demand for wastewater treatment services or water supplies. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the construction of new or expanded water or wastewater treatment or collection facilities. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the construction of new water or wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in water or wastewater treatment or collection facilities, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures:

UTL-1 **Fair-Share Sewer Impact Fees.** Prior to issuance of a grading permit, the City of Monrovia, under the Director of Public Services, shall execute an agreement with the Developer to contribute a fair-share portion of the costs to replace sewer main pipe segments 173-029 to 172-010. The fair-share portion of the cost of replacing the sewer line segment is estimated to be 5 percent (preliminarily estimated to be $6,600). This payment shall be provided by the Developer to the City's Director of Public Services, or designee, prior to issuance of a certificate of occupancy.

Significance Determination with Mitigation Incorporated: Less Than Significant

(c) Would the Project 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?

Hotel Development. As discussed further in Section 4.9, Hydrology and Water Quality, the proposed Project would permanently increase the on-site impervious surface area by 1.39 acres compared to the existing condition, which would increase runoff peak flow. However, the Project would include implementation of an underground infiltration chamber that would capture stormwater runoff to retain any increase in flow and meet hydromodification requirements. The infiltration chamber would be sized to accommodate 7,972 cubic feet of water. In the event that runoff exceeds the 85th percentile design storm and overflow occurs, the overflow would drain to the storm drain system in Huntington Drive. The release rate of overflow would not exceed the maximum release rate of 1.04 cubic foot per second per acre (cfs/acre) in compliance with the Los Angeles County Flood Control District requirements. Because stormwater flows would be attenuated by the underground infiltration chamber to meet hydromodification requirements, and overflow would be accommodated by the downstream storm drain systems, the capacity of the downstream storm drain would not be exceeded. As specified in Mitigation Measure WQ-3, a detailed Final Hydrology and Hydraulic Report would be prepared for the proposed Project to ensure that the on-site storm drain facilities, including the underground infiltration chamber, are appropriately sized to reduce stormwater runoff. Therefore, the Project would not cause or require the expansion of existing storm water drain facilities, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in increased stormwater generated in the City. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the construction of new or expanded storm water drainage facilities. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions outlined in Chapter 12.36, Storm Water and Urban Runoff Pollution Control, of the City's Municipal Code and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to storm water drainage facilities, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(d) Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Hotel Development. Refer to Response 4.18(b). The proposed Project would generate approximately 13,625 gpd of wastewater and approximately 5,450 gpd (6.1 af/yr) of potable water. According to the City of Monrovia's *Urban Water Management Plan* (2015), citywide demand for potable water was 6,229 af (5,560,892 gpd) in 2015 and is expected to increase to 6,635 af (5,923,345 gpd) by 2020. Projected water demand would represent approximately 0.09 percent of the projected water demand in 2020. The 2015 UWMP indicates that the City has adequate water supplies to serve existing and projected water demands through the year 2040. As such, the incremental water demand generated by the proposed Project would be within the available water supplies to serve the Project from existing entitlements and resources and would not necessitate new or expanded entitlements.

Although the Project-related increase in demand for water is anticipated to be within the City's existing and projected water supply capacity, it is important to note that the Main San Gabriel Basin (MSGB) is experiencing drought conditions. The MSGB adopted a Drought Master Plan in 2017 that includes new directives and assessments for water production. These assessments are intended to pay for the cost of replacement water to help replenish the MSGB. As such, the City passed new water rates in January 2018 in order to pay for the new pass-through water production costs related to the ongoing drought conditions impacting the MSGB. The proposed Project would be subject to these increased water rates, which would serve to further ensure that impacts related to water supplies would be less than significant, and no mitigation is required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in an increased demand for water supplies. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the construction of new or expanded water supply entitlements facilities. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in an increased demand for water supplies. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to an increased demand for water, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(e) Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Hotel Development. Refer to Response 4.18(b). Although the proposed Project would increase demand for wastewater treatment, the increased wastewater generated by the Project could be accommodated within the design capacity of the treatment plants currently serving the City. Therefore, the proposed Project would not impact the wastewater treatment provider's service capacity or the ability of the service provider to meet existing service commitments. Project-related impacts related to wastewater generation and treatment would be less than significant, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in an increased demand for wastewater treatment services. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the capacity of wastewater treatment providers to provide treatment services to the City. No mitigation would be required.

Refer to Response 4.18(b). Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in an increased demand for wastewater treatment facilities. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to wastewater treatment facilities, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

(f) Would the Project be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Hotel Development. The City of Monrovia approved a franchise agreement with Athens Services to serve as the exclusive provider of citywide trash and recycling services in June 2016. Solid waste generated within the City is transported to either the Antelope Valley Public Landfill, the Azusa Land Reclamation Co. Landfill, Chiquita Canyon Landfill, the Commerce Refuse-to-Energy Facility, El Sobrante Landfill, Frank R. Bowerman Sanitary Landfill, Lancaster Landfill and Recycling Center, Mid-Valley Sanitary Landfill, Olinda Alpha Sanitary Landfill, San Timoteo Sanitary Landfill and Recycling Center, Simi Valley Landfill – Recycling Center, Southeast

Resource and Recovery Center, Sunshine Canyon City/County Landfill, or the Victorville Sanitary Landfill.[51]

Non-hazardous waste from Project construction activities would be recycled to the extent feasible, and where necessary, would be disposed of at one of the aforementioned landfills.[52] Because the Project site is currently vacant, construction waste is anticipated to be minimal compared to waste generated throughout the lifetime of the Project during Project operation. The proposed Project would generate approximately 39.79 tons per year (0.109 tons of solid waste per day) during Project operation.[53] The incremental increase of solid waste generated by the proposed Project would constitute approximately 0.12 percent of the total amount of solid waste generated in the City (32,163.79 tons) on an annual basis. Furthermore, in the event that a landfill serving the City could no longer accept solid waste generated by the proposed Project, solid waste would be disposed of at one of the other multiple landfills serving the City. Therefore, solid waste generated by the proposed Project would not cause the capacity of the landfills serving the City to be exceeded. Therefore, the proposed Project would result in a less than significant impact with respect to solid waste generation and landfill capacity, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use pattern, and as such, would not result in an increase in solid waste generated in the City. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the capacity of landfills currently serving the City. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the generation of solid waste that would cause a landfill serving the City to be exceeded. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines*. Therefore, the proposed GPA would not result in impacts related to the generation of solid waste, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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[51] California Department of Resources Recycling and Recovery (CalRecycle). Jurisdictional Disposal by Facility. Disposal during 2016 for Monrovia. Website: http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2016%26ReportName%3dReportEDRSJurisDisposalByFacility%26OriginJurisdictionIDs%3d313 (accessed August 25, 2017).

[52] Hazardous waste during Project construction would be required to be disposed of at one of the hazardous waste collection centers operated by LACSD and/or the Los Angeles County Department of Public Works.

[53] 109 rooms * 2 lbs per room per day (generation rate obtained from CalRecycle, Estimated Solid Waste Generation and Disposal) => 218 pounds per day (the equivalent of 0.109 tons)/79,570 pounds per year (the equivalent of 39.79 tons per year).

(g) Would the Project comply with federal, state, and local statutes and regulations related to solid wastes?

Hotel Development. The California Integrated Waste Management Act (Assembly Bill [AB] 939) changed the focus of solid waste management from landfill to diversion strategies, such as source reduction, recycling, and composting. The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995, 50 percent by 2000, and 75 percent by 2020. In 2006, the City reported a waste diversion rate of 69 percent to the California Integrated Waste Management Board, well surpassing the State-mandated diversion rate of 50 percent.

Construction activities would generate some construction debris. However, the Project would comply with the City's Construction and Demolition Recycling Program (ORD-2003-08), which requires that certain demolition and/or construction Projects complete and submit a Waste Management Plan to be approved by the City's Public Services Department, and that they divert at least 50 percent of waste through recycling, salvage, or deconstruction.

The proposed Project would comply with existing or future statutes and regulations, including waste diversion programs mandated by City, State, or federal law. In addition, as discussed above, the proposed Project would not result in an excessive production of solid waste that would exceed the capacity of the existing landfills serving the Project site. Therefore, the proposed Project would not result in an impact related to federal, State, and local statutes and regulations related to solid wastes, and no mitigation would be required.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in an increase in solid waste generated in the City. Therefore, the proposed textual amendments to the LUE would not result in impacts related to conflicts with federal, State, and local statutes regulating solid waste. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements that would result in the generation of solid waste. Future individual projects resulting from the approval of the proposed LUE would be subject to applicable provisions of Chapter 8.09, Waste Management Plan, and would also be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines* and would be required to comply with existing and future statutes and regulations mandated by the City, Sate, or federal law. Therefore, the proposed GPA would not result in impacts related to federal, State, and local statutes regulating solid waste, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	☐	☐	☒	☐
(c)	Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact Analysis:

(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?

Hotel Development. The Project site is located in an urban area. The Project site is currently undeveloped. No portion of the Project site or the immediately surrounding area contains an open body of water that serves as natural habitat in which fish could exist. Likewise, the Project site is not suitable to support special-status species, and no known candidate, sensitive, or special-status species are known to inhabit the site. Due to the urban nature of the site and limited on-site landscaping, impacts to candidate, sensitive, or special-status plant and animal species would be less than significant. Based on the Project Description and the preceding responses, development of the proposed Project does not have the potential to degrade the quality of the natural environment. The proposed Project would include the planting of a variety of trees along the perimeter of the undeveloped portion of the Project site, as well as in the interior of the site. The proposed Project would also include shrubs throughout the site and a vegetated hedge along the southern boundary of the site. While there is no landscaping on the Project site, the existing Taco Bell restaurant immediately west of the site includes existing trees along the southern perimeter of the property that may provide suitable habitat for nesting migratory birds, some of which are protected by the Migratory Bird Treaty Act (MBTA) and could be disturbed during Project construction activities in close proximity. Disturbing or destroying active nests that are protected is a violation of the MBTA. In addition, nests and eggs are protected under Fish and Game Code Section 3503. Adherence to Mitigation Measure BIO-1

would ensure that the Project complies with the MBTA. Mitigation Measure BIO-1 requires nesting bird surveys if construction commences between February 1 and September 15 to reduce potential Project impacts related to migratory birds. With implementation of Mitigation Measure BIO-1, potential impacts to biological resources would be less than significant.

There are no previously recorded cultural resources on the Project site. In addition, the potential for paleontological resources on the Project site is considered low because the site contains Artificial Fill (which has no paleontological sensitivity) to a depth of 7 feet (ft.) below ground surface (bgs). However, due to historic development on the Project site, there is potential for subsurface archaeological deposits below the Artificial Fill in the Young Alluvial Fan Deposits (which have low paleontological sensitivity from the surface to a depth of 10 ft. and a high sensitivity below that mark). Mitigation Measure CUL-1 requires that an archaeological monitor be on site during ground-disturbing activities to monitor for buried prehistoric or historic material when excavation occurs in previously undisturbed native soil (i.e., in Young Alluvial Fan Deposits) from a depth of approximately 7 ft. bgs to 10 ft. bgs. Mitigation Measure CUL-2 requires preparation of a Paleontological Resources Impact Mitigation Program (PRIMP), which shall establish methods that will be used to protect potential paleontological resources on the site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. Mitigation Measure CUL-3 requires notification of the proper authorities and adherence to standard procedures for the respectful handling of human remains. In addition, Mitigation Measure TCR-1 requires Native American monitors to be present on site for ground-disturbing activities in native soils between 7 and 10 ft. bgs. Implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and TCR-1 would reduce any potential impacts to previously undiscovered cultural resources, paleontological resources, or human remains to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns, and as such, would not result in the degradation of the quality of the environment. Therefore, the proposed textual amendments to the LUE would not result in impacts related to the quality of the environment, habitat or populations of a fish or wildlife species, plant or animal communities, or important examples of the major periods of California history or prehistory. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines* and would be required to comply with existing and future statutes and regulations mandated by the City, Sate, or federal law. Therefore, the proposed GPA would not result in impacts related to the quality of the environment, habitat or populations of a fish or wildlife species, plant or animal communities, or important examples of the major periods of California history or prehistory. No mitigation would be required.

Significance Determination: Potentially Significant Impact.

Mitigation Measures: Refer to Mitigation Measures BIO-1, CUL-1, CUL-2, CUL-3, and TCR-1

Significance Determination after Mitigation: Less Than Significant

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

Hotel Development. The proposed Project would not result in or contribute to a significant biological or cultural impact. Based on the Project Description and the preceding responses, impacts related to the proposed Project are less than significant or can be reduced to less than significant levels with incorporation of mitigation measures. The proposed Project's contribution to any significant cumulative impacts would be less than cumulatively considerable.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns would result in cumulatively considerable environmental impacts. Therefore, the proposed textual amendments to the LUE would not result in cumulatively considerable environmental impacts. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines* and would be required to comply with existing and future statutes and regulations mandated by the City, Sate, or federal law. Therefore, the proposed GPA would not result in cumulatively considerable impacts, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Hotel Development.

The proposed Project would result in less than significant impacts with respect to agricultural resources, air quality and greenhouse gas emissions, land use and planning, mineral resources,

population and housing, public services, and recreation. The Project would also result in less than significant impacts with respect to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation and traffic, tribal cultural resources, and utilities and service systems with mitigation incorporated. Based on the Project Description and the preceding responses, development of the proposed Project would not cause substantial adverse effects to human beings because all potentially significant impacts of the proposed Project can be mitigated to a less than significant level.

General Plan Land Use Element Amendment. The proposed textual revisions to the City's General Plan Land Use Element (LUE) are intended to clarify language throughout the LUE. These textual revisions would not result in any changes to future land use patterns would result in environmental impacts. Therefore, the proposed textual amendments to the LUE would not result in environmental impacts that would cause substantial adverse effects on human beings. No mitigation would be required.

Although the proposed GPA to the City's General Plan LUE would allow for the intensification and development of underdeveloped parcels in the Crossroads District with higher-density development, approval of the GPA does not include any physical improvements. Future individual projects resulting from the approval of the proposed LUE would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the *State CEQA Guidelines* and would be required to comply with existing and future statutes and regulations mandated by the City, Sate, or federal law. Therefore, the proposed GPA would not result in adverse effects on the environment or human beings, and no mitigation would be required.

Significance Determination: Potentially Significant Impact

Mitigation Measures: Refer to Mitigation Measures AES-1 and AES-2, BIO-1, CUL-1 through CUL-3, GEO-1, HAZ-1 and HAZ-2, WQ-1 through WQ-3, NOI-1 and NOI-2, ULT-1, and TCR-1.

Significance Determination after Mitigation: Less Than Significant

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5.0 MITIGATION MONITORING AND REPORTING PROGRAM

5.1 MITIGATION MONITORING REQUIREMENTS

Public Resources Code (PRC) Section 21081.6 (enacted by the passage of Assembly Bill [AB] 3180) mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

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

- The Lead Agency shall specify the location and custodian of the documents or other material, which constitute the record of proceedings upon which its decision is based. A public agency shall provide the measures to mitigate or avoid significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of Project approval may be set forth in referenced documents which address required mitigation measures or in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

- Prior to the close of the public review period for a draft Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND), a Responsible Agency, or a public agency having jurisdiction over natural resources affected by the Project, shall either submit to the Lead Agency complete and detailed performance objectives for mitigation measures which would address the significant effects on the environment identified by the Responsible Agency or agency having jurisdiction over natural resources affected by the Project, or refer the Lead Agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a Lead Agency by a Responsible Agency or an agency having jurisdiction over natural resources affected by the Project shall be limited to measures that mitigate impacts to resources, which are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance by a Responsible Agency or agency having jurisdiction over natural resources affected by a Project with that requirement shall not limit that authority of the Responsible Agency or agency having jurisdiction over natural resources affected by a Project, or the authority of the Lead Agency, to approve, condition, or deny Projects as provided by this division or any other provision of law.

5.2 MITIGATION MONITORING PROCEDURES

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Monrovia to ensure that all mitigation measures adopted as part of the proposed Project will be carried out as described in this IS/MND. Table 5.A lists each of the mitigation measures specified in this document and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
4.1 Aesthetics		
AES-1: Maintenance of Construction Barriers. Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours."	City of Monrovia Community Development Director, or designee	Prior to issuance of any construction permits
A**ES-2: Comprehensive Lighting Plan.** Prior to issuance of a building permit, the Project Developer shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America's [IESNA]) and shall be in compliance with applicable standards of the City's Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, on-site driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as de termined by the illumination engineer: • Exterior on-site lighting shall be shielded and confined within site boundaries. • No direct rays or glare are permitted to shine onto public streets or adjacent sites. • Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted. • The site shall not be excessively illuminated based on the illumination recommendations of the IESNA.	City of Monrovia Community Development Director, or designee	Prior to issuance of any building permits
4.2 Agricultural & Forest Resources		
The proposed Project would not result in significant adverse impacts related to agriculture. No mitigation would be required.		

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
4.3 Air Quality		
Compliance Measure: AQ-1: Construction Emissions. During construction activities, the Project shall comply with regional rules that assist in reducing short-term air pollutant emissions. The South Coast Air Quality Management District (SCAQMD) Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rules 403 and 402 are as follows: • The Project Construction Contractor shall develop and implement dust-control methods that shall achieve this control level in a SCAQMD Rule 403 dust control plan, designate personnel to monitor the dust control program, and order increased watering, as necessary, to ensure a 55 percent control level. Those duties shall include holiday and weekend periods when work may not be in progress. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following: ○ Apply water twice daily, or nontoxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces or as needed to areas where soil is disturbed. ○ Use low-sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2. ○ During earthmoving or excavation operations, fugitive dust emissions shall be controlled by regular watering to prevent excessive amounts of dust, ceasing earthmoving and excavation activities during periods of high winds (i.e., winds greater than 20 miles per hour [mph] averaged over 1 hour), and minimizing the area disturbed by earthmoving or excavation operations at all times. ○ After earthmoving or excavation operations, fugitive dust emissions shall be controlled by revegetating and watering portions of the construction area to remain inactive longer than a period of 3 months and watering all active portions of the construction site.	Project Developer	During construction activities

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
○ At all times, fugitive dust emissions shall be controlled by limiting the on-site vehicle speed to 15 miles per hour (mph) and paving road improvements as soon as feasible. ○ At all times during the construction phase, ozone precursor emissions from mobile equipment shall be controlled by maintaining equipment engines in good condition and in proper tune according to manufacturers' specifications. ○ Outdoor storage piles of construction materials shall be kept covered, watered, or otherwise chemically stabilized with a chemical wetting agent to minimize fugitive dust emissions and wind erosion.		
Compliance Measure: AQ-2: Idling Restrictions. During construction activities, the Project shall comply with Mitigation Measure AIR-C of the City of Monrovia General Plan Proposed Land Use and Circulations Elements Environmental Impact Report (2008) to reduce to reduce diesel engine emissions of ozone (O_3) precursors, reactive organic gases (ROGs) and nitrogen oxides (NO_X), particulate matter less than 10 microns in size (PM_{10}), particulate matter less than 2.5 microns in size ($PM_{2.5}$), and diesel particulate matter (PM). • Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 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 manufacturers' recommended operating temperature; ○ When the ambient temperature is below 40 degrees Fahrenheit (°F) or above 85°F; or ○ When equipment is being repaired.	Director of the City of Monrovia Community Development Department, or designee,	During construction activities

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
Compliance Measure AQ-3: Odors. Throughout operation of the proposed Project, the Director of the City of Monrovia (City) Community Development Department, or designee, shall ensure that the Project complies with applicable provisions of Section 8.10.30 of the City's Municipal Code, which requires that every person in control of the day-to-day operations at any commercial premise provide for the collection and proper disposal of solid waste at least once per week.	Director of the City of Monrovia Community Development Department, or designee	Throughout operation of the proposed Project
4.4 Biological Resources		
BIO-1: Migratory Bird Treaty Act. In the event that construction activities should commence between February 1 and September 15, the Developer (or its contractor) shall retain a qualified biologist (i.e., a professional biologist that is familiar with local birds and their nesting behaviors) to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. The nesting survey shall include the Project site and areas immediately adjacent to the site that could potentially be affected by Project-related construction activities such as noise, human activity, and dust, etc. If active nesting of birds is observed within 100 feet (ft.) of the designated construction area prior to construction, the biologist shall establish suitable buffers around the active nests (e.g., as much as 500 ft. for raptors and 300 ft. for nonraptors [subject to the recommendations of the qualified biologist]), and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Prior to commencement of grading activities, the Director of the City of Monrovia Community Development Department, or designee, shall verify that all Project grading and construction plans are consistent with the requirements stated above, that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field with orange snow fencing.	Director of the City of Monrovia Community Development Department, or designee	In the event that vegetation and tree removal should occur between February 1 and September 15/three days prior to commencement of construction activities/Prior to commencement of grading activities
4.5 Cultural Resources		
CUL-1: Archaeological Monitors. Prior to the issuance of a grading permit, the Developer shall submit proof to the Director of the City of Monrovia (City) Community Development Department, or designee, that a qualified archaeologist has been retained to provide professional archaeological monitoring services for any construction activities that may disturb native soils (i.e., Young Alluvial Fan Deposits) from approximately 7 feet (ft.) below ground surface (bgs) to a depth of 10 ft. bgs. The monitor shall be present at the pre-grading conference to explain the cultural monitoring requirements associated with the proposed Project. If any significant historical resources or archaeological resources are encountered		Prior to the issuance of a grading permit

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
during monitoring, work shall stop within the immediate vicinity of the resource, with the precise area to be determined by the monitor, until such time as the resource can be evaluated by an archaeologist and any other appropriate individuals. Project personnel shall not collect or move any archaeological materials and associated materials. To the extent feasible, Project activities shall avoid these resources. Where avoidance is not feasible, the archaeological resources shall be evaluated for their eligibility for listing in the California Register of Historical Resources. If the resources are not eligible, avoidance is not necessary. If the resources are eligible, adverse effects on the resources must be avoided, or such effects must be mitigated. Mitigation can include, but is not necessarily limited to: excavation of the deposit in accordance with a data recovery plan, per California Code of Regulations (CCR) Title 4(3) Section 5126.4(b)(3)(C) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; production of a report detailing the methods, findings, and significance of the archaeological site and associated materials; curation of archaeological materials at an appropriate facility for future research and/or display; an interpretive display of recovered archaeological materials at a local school, museum, or library; and public lectures at local schools and/or historical societies on the findings and significance of the site and recovered archaeological materials.		
CUL-2 Unknown Paleontological Resources. In the event that paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 ft. of the find until a qualified paleontologist (i.e., a practicing paleontologist that is recognized in the paleontological community and is proficient in vertebrate paleontology and is approved by the Director of the City Community Development Department, or designee) has evaluated the find in accordance with federal, State, and local guidelines. Personnel of the proposed Project shall not collect or move any paleontological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. If any fossil remains are discovered in sediments with a Low paleontological sensitivity rating (Young Alluvial Fan Deposits), the paleontologist shall make recommendations as to whether monitoring shall be required in these sediments on a full-time basis. Prior to commencement of grading activities, the Director of the City Community Development Department, or designee, shall verify that all Project grading and construction plans specify federal, State, and local requirements related to the unanticipated discovery of paleontological resources as stated above.	Director of the City of Monrovia Community Development Department, or designee	In the event that paleontological resources are discovered during excavation, grading, or construction activities prior to commencement of grading activities

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
CUL-3: Human Remains. In the event that human remains are encountered on the Project site, work within 50 ft. of the discovery shall be redirected and the Los Angeles County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code (HSC) Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the Los Angeles County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, Director of the City Community Development Department, or its designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State HSC Section 7050.5, and PRC Section 5097.98, as stated above.	Director of the City of Monrovia Community Development Department, or designee	In the event that human remains are encountered on the Project site
4.6 Geology and Soils		
GEO-1: Incorporation of and Compliance with the Recommendations in the Geotechnical Study. All grading operations and construction shall be conducted in conformance with the recommendations included in the Geological Engineering Investigation for the Proposed TownePlace Suites Hotel E. Huntington Drive & S. Myrtle Avenue, Monrovia, California (Geotechnical Investigation) conducted by Salem Engineering Group, Inc. (September 30, 2016)(provided in Appendix E), as approved by the City of Monrovia (City) Engineer. Recommendations found in the geotechnical document address topics including, but not limited to, the following: • Earthwork, including site preparation (e.g., grading), soil replacement, compaction standards, groundwater seepage, and fill placement; • Foundations, including design recommendations and parameters;	Project Geotechnical Consultant/City Engineer, or designee	Prior to construction or grading activities

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
• Soil excavations; • Seismic design parameters; • Retaining wall design and construction criteria including backfill requirements; • Concrete flatwork, including exterior slabs, and design of these features; • Underground utility trenches; • Surface drainage; • Pavement design; • Soil corrosion; and • Post-construction considerations, including drainage. Additional site grading, foundation, and utility plans shall be reviewed by the Project Geotechnical Consultant prior to construction to check for conformance with the recommendations of this report. The Project Geotechnical Consultant shall be present during site grading and foundation construction to observe and document proper implementation of the geotechnical recommendations. The City of Monrovia (City) shall require the Project Geotechnical Consultant to perform at least the following duties during construction: • Observe earthwork and test compacted fill to ensure soils are suitable for re-use as engineered fill. • Observe and test imported fill prior to bringing soil to the site. • Observe and test the bottom of removals to check that the recommendations presented in the Geotechnical Investigation are incorporated during site grading, construction of Project improvements, and excavation of foundations. • Observe all trench and foundation excavation bottoms prior to placing bedding sands, fill, steel, gravel, or concrete. • Observe foundation excavations prior to the placement of reinforcing steel and concrete to verify that excavations and exposed soil conditions are consistent with those anticipated. If unanticipated soil conditions are encountered, foundation modifications may be required. Grading plan review shall also be conducted by the City Engineer, or designee, prior to the start of grading to verify that requirements developed during the preparation of geotechnical documents (Appendix E) have been appropriately incorporated into the Project plans. Design, grading, and construction shall be performed in accordance with the requirements of the City Building Code and the California Building Code (CBC) applicable at the time of grading, as well		

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
as the recommendations of the Project Geotechnical Consultant as summarized in the final Geotechnical Investigation subject to review by the City Engineer, or designee, prior to the start of grading activities. The final Geotechnical Investigation shall present the results of observation and testing done during grading activities.		
4.7 Greenhouse Gas Emissions		
The proposed Project would not result in significant adverse impacts related to greenhouse gas emissions. No mitigation would be required.		
4.8 Hazards and Hazardous Materials		
HAZ-1 Contingency Plan. Prior to commencement of grading activities, the Director of the County of Los Angeles Environmental Health Division, or designee, shall approve a contingency plan that addresses the procedures to be followed should on-site unknown hazards or hazardous substances be encountered during demolition and construction activities. The plan shall indicate that if construction workers encounter underground tanks, gases, odors, uncontained spills, or other unidentified substances, the contractor shall stop work, cordon off the affected area, and notify the Monrovia Fire and Rescue Department (MFRD). The MFRD responder shall determine the next steps regarding possible site evacuation, sampling, and disposal of the substance consistent with local, State, and federal regulations.	Director of the County Environmental Health Division, or designee	Prior to commencement of grading activities
HAZ-2: Construction Staging and Traffic Management Plan. Prior to issuance of a grading permit, a Construction Staging and Traffic Management Plan shall be subject to review and approval by the Director of the City of Monrovia (City) Public Services Department, or designee. The Construction Staging and Traffic Management Plan shall include the name and phone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations. The Construction Staging and Traffic Management Plan shall include, but not be limited to, the following: • Temporary lane closures shall be implemented consistent with the recommendations of the *California Joint Utility Traffic Control Manual* (February 2014). • Flag persons in adequate numbers shall be provided to minimize impacts to traffic flow and to ensure safe access into and out of the site. • Flag persons shall be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. • All emergency access to the Project site and adjacent areas shall be clearly marked and	Director of the City of Monrovia Public Services Department, or designee	Prior to issuance of a grading permit

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
kept clear and unobstructed during all phases of construction. • Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing and protection barriers. Specifically, the plan shall identify pedestrian routes from the construction site (i.e., the Project site) to adjacent sidewalks and walkways. • Construction-related deliveries, other than concrete and earthwork-related deliveries, shall be scheduled so as to reduce travel during peak travel periods (i.e., 6:00 a.m. to 9:00 a.m. and 3:30 p.m. to 7:00 p.m. Monday through Friday). • If necessary, a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities shall be obtained. • Construction vehicles, including construction personnel vehicles, shall park on the Project site and shall not park on public streets. • Construction vehicles shall not stage or queue where they interfere with pedestrian and vehicular traffic or block access to nearby businesses. • Any traffic lane closures shall be limited to off-peak traffic periods, as approved by the City of Monrovia Department of Public Services. • The Monrovia Police Department shall be notified a minimum of 24 hours in advance of any lane closures or other roadway work. • Foothill Transit shall be notified a minimum of 24 hours in advance of any lane closures or other roadway work.		
4.9 Hydrology and Water Quality		
WQ-1:Construction General Permit. Prior to issuance of a grading permit, the Developer shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent (NOI) for coverage under the permit to the State Water Resources Control Board (SWRCB). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is received from the SWRCB. The Developer shall provide the WDID to the City of Monrovia (City) to demonstrate proof of coverage under the Construction General Permit. The Developer shall ensure that a Storm Water Pollution Prevention Plan (SWPPP) is prepared and implemented by	Project Developer	Prior to issuance of a grading permit

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
the Construction Contractor for the project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in storm water runoff as a result of construction activities.		
WQ-2: Erosion and Sediment Control Plan. If construction activities occur between October 15 and April 15, the Developer shall obtain an erosion and sedimentation control permit from the Director of the City Community Development Department, or designee prior to initiation of construction activities. As part of the erosion and sedimentation control permit application, a registered civil engineer shall prepare and submit an Erosion and Sediment Control Plan to the City for review and approval, on compliance with the requirements of the City of Monrovia Municipal Code Title 15, Chapter 15.28, Section 15.28.070. Construction activities shall not commence until the Developer receives written approval of the Erosion and Sediment Control Plan by the City.	Director of the Monrovia Community Development Department, or designee	Prior to initiation of construction activities (if construction activities occur between October 15 and April 15)
WQ-3:Hydrology and Hydraulic and Low Impact Development Plan. Prior to issuance of a grading permit, the Developer shall submit a Final Hydrology and Hydraulic and Low Impact Development (LID) Report to the City Community Development Director, or designee, for review and approval, in compliance with the Los Angeles County MS4 Permit and as specified in Title 12, Chapter 12.36, Section 12.36.100 of the City of Monrovia Municipal Code. The Final Hydrology and Hydraulic and LID Report shall include LID and Source Control Best Management Practices (BMPs) to be incorporated into the Project design to target pollutants of concern in runoff from the Project site. The Director of the City Community Development Department shall confirm that the post-construction BMPs have been installed and a maintenance plan has been prepared prior to issuance of a Certificate of Occupancy.	Director of the Monrovia Community Development Department, or designee	Prior to issuance of a grading permit
4.10 Land Use/Planning		
The proposed Project would not result in significant adverse impacts related to land use/planning. No mitigation would be required.		
4.11 Mineral Resources		
The proposed Project would not result in significant adverse impacts related to mineral resources. No mitigation would be required.		

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
4.12 Noise		
Compliance Measure NOI-1: Stationary Noise Sources. During construction activities, the Project shall comply with Mitigation Measure NOI-A of the *City of Monrovia General Plan Proposed Land Use and Circulations* Elements *Environmental Impact Report (2008)* to further reduce noise emitted from stationary noise sources on the Project site. As required by Mitigation Measure NOI-A, Stationary noise sources associated with future non-residential uses (e.g., mechanical equipment and loading docks) within the Project areas shall not have a direct line-of- sight to noise-sensitive uses. The line-of-sight between the noise source and noise-sensitive receptor shall be blocked through the orientation of the non-residential land use and/or by using noise barriers, such as a concrete block wall or enclosing the noise source. The Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that noise-reducing measures have been implemented in the Project Design.	Project Developer	During construction activities
Compliance Measure NOI-2: Construction. During construction activities, the Project shall comply with Mitigation Measures NOI-C through NOI-F of the *City of Monrovia General Plan Proposed Land Use and* Circulations *Elements Environmental Impact Report (2008)* to further reduce construction noise. The Director of the City of Monrovia Community Development Department, or designee, shall require the Project Developer to implement the following construction measures during construction of the Project, as required by Mitigation Measures NOI-C through NOI-F: • All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices. • Grading and Construction Contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment). • All residential units located within 500 feet (ft.) of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 ft. shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints. • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting	Project Developer	During construction activities

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 ft. of the construction site, and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.		
NOI-1: Vendor Delivery Hours. Prior to issuance of building permits, the Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that, at a minimum, the Developer shall limit vendor deliveries to the Project site to the hours between 7:00 a.m. and 7:00 p.m. daily.	Project Developer/City Community Development Department, or designee	Prior to issuance of building permits
NOI-2: Land Use Compatibility Standards. Prior to issuance of building permits, the Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that the following measures have been implemented in the Project Design: • Installation of air conditioning, which would allow hotel room windows to remain closed. • Incorporation of standard building construction requirements consisting of walls, windows, and doors with a minimum rating of sound transmission class (STC)-24.	Project Developer/City Community Development Department, or designee	Prior to issuance of building permits
4.13 Population and Housing		
The proposed Project would not result in significant adverse impacts related to population or housing. No mitigation would be required.		
4.14 Public Services and Utilities		
The proposed Project would not result in significant adverse impacts related to public services or utilities. No mitigation would be required.		
4.15 Recreation		
The proposed Project would not result in significant adverse impacts related to recreation. No mitigation would be required.		
4.16 Transportation/Traffic		
The proposed Project would not result in significant adverse impacts related to transportation/traffic. No mitigation would be required		

Table 5.A: Mitigation and Monitoring Reporting Program

Mitigation Measures	Responsible Party	Timing for Compliance Measure or Mitigation Measure
4.17 Tribal Cultural Resources		
TCR-1: Tribal Cultural Resources: Monitoring Procedures. Prior to commencement of any ground-disturbing activities, the Project Developer shall present evidence to the Director of the City of Monrovia Community Department, or designee, that a qualified Native American monitor has been retained to provide Native American monitoring services during ground-disturbing activities at depths between 7 to 10 feet (ft.) below ground surface (bgs). The Native American monitor shall be selected by the Project Developer from the list of certified Native American monitors maintained by the Gabrieleno Band of Mission Indians – Kizh Nation. The Native American monitor shall be present at the pre-grading conference to establish procedures for tribal cultural resource surveillance. Those procedures shall include provisions for temporarily halting or redirecting work to permit sampling, identification, and evaluation of resources deemed by the Native American monitor to be tribal cultural resources as defined in Public Resources Code Section 21074. In the event that human remains are encountered on the site and are determined to be of Native American origin, the Project Developer would be required to comply with applicable provisions in Mitigation Measure CUL-3 included in this Initial Study/Mitigated Negative Declaration. These procedures shall be reviewed and approved by the City of Monrovia Community Department Director, or designee, prior to commencement of any surface disturbance on the Project site.	Director of the City of Monrovia Community Development Department, or designee	Prior to commencement of any ground-disturbing activities at depths between 7 to 10 ft. bgs.
4.18 Utilities/Service Systems		
UTL-1: Fair-Share Sewer Impact Fees. Prior to issuance of a grading permit, the City of Monrovia, under the Director of Public Services, shall execute an agreement with the Developer to contribute a fair-share portion of the costs to replace sewer main pipe segments 173-029 to 172-010. The fair-share portion of the cost of replacing the sewer line segment is estimated to be 5 percent (preliminarily estimated to be $6,600). This payment shall be provided by the Developer to the City's Director of Public Services, or designee, prior to issuance of a certificate of occupancy.	Director of the City of Monrovia Public Services Department, or designee	Agreement: Prior to issuance of a grading permit Payment: Prior to issuance of certificate of occupancy

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