127 Pomona Specific Plan and Mixed-Use Development
Initial Study/Mitigated Negative Declaration

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

Project Applicant:
Fifield Realty Corporation
1250 6th Street, Suite 403
Santa Monica, California 90401

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

September 5, 2019

- This document is designed for double-sided printing -

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Initial Study and Mitigated Negative Declaration

APPLICATION

127 Pomona Avenue Specific Plan and Mixed-Use Development

Conditional Use Permit for new construction

Parcel map to consolidate seven parcels into one parcel

Zoning Ordinance and Map Amendment to add 127 Pomona Avenue Specific Plan to Section 17.54 of the Monrovia Municipal Code

APPLICANT/ADDRESS

Fifield Realty Corporation
1250 6th Street, Suite 403
Santa Monica, California 90401

PROJECT ADDRESS

123, 127, 141, and 145 West Pomona Avenue
1528 and 1532 South Primrose Avenue
Monrovia, CA 91016

PROJECT LOCATION

The project site is located in the City of Monrovia at the northeast corner of South Primrose Avenue and West Pomona Avenue, with frontage along West Evergreen Avenue. Figure 2 (Regional Context Map) shows the regional context, and Figure 3 (Vicinity Map) identifies the boundaries of the project site.

PROJECT DESCRIPTION

The proposed project is a transit-oriented, infill, mixed-use development with residential and commercial uses on a 1.83-acre site. The residential component consists of 310 apartment units, 25 of which are affordable units set aside for very-low-income and moderate-income households (8.4% of the total units). The development would be seven stories (approximately 95 feet maximum with mechanical equipment and projections) in height and include approximately 347,545 square feet of floor area (above grade), with two levels of underground parking and one level of at-grade parking (see Figures 5a-5c, Elevations). It would be a wrap-around podium construction, with the ground floor containing commercial and parking spaces and residential levels above starting on the 2nd floor. The residential units are located between the 2nd and 7th floors with an approximate floor area of 278,774 square feet. The project would include approximately 10,000 square feet of ground-floor commercial. The project provides 477 parking spaces in a parking garage, of which 373 spaces would be assigned to the residential use and the remainder for commercial and public parking purposes (see Figure 4b, Site Plan). The project includes deed-

restricted affordable units, that qualify for a density/intensity bonus, incentives, and other provisions pursuant to California Government Code Section 65915 et seq. (“Density Bonus Law”).

The project proposes a mix of studio, one, and two-bedroom apartment units. Proposed onsite amenities and open spaces include public plazas, courtyard, a sky deck, a party room, and fitness center for residents.

The applicant proposes a parcel map to consolidate 7 parcels into a single 1.83-acre parcel. Two existing industrial structures onsite would be demolished.

APN	Address	Area
8507-002-033	127 West Pomona Avenue	11,761.2 sf
8507-002-034	No address available	10,018.8 sf
8507-002-035	123 West Pomona Avenue	38,332.8 sf
8507-002-038	145 West Pomona Avenue	3,307 sf
8507-002-039	141 West Pomona Avenue	6,462 sf
8507-002-907	1528 South Primrose Avenue	4,119 sf
8507-002-908	1532 South Primrose Avenue	5,065 sf

Right-of-way improvements on streets abutting the site (Pomona Avenue, Evergreen Avenue, and Primrose Avenue) include new curb cuts, sidewalks, and streetscaping. Vehicular access to the project site would be provided through 26-foot-wide driveways, one each on Primrose Avenue and Pomona Avenue. The Pomona Avenue driveway accesses retail and public parking on the ground floor and Primrose Avenue driveway accesses underground parking areas. Pedestrian infrastructure improvements include additional sidewalk areas of up to 12 feet in width along Pomona Avenue and Primrose Avenue and 9.75 feet on Evergreen Avenue.

The proposed project provides 479 parking spaces within a three-level parking garage, of which 366 spaces would be assigned to the residential use and the remainder for commercial and public parking purposes (see Figure 4b Site Plan). The ground floor contains 50 parking spaces that will be required to remain available for public use. Two levels of subterranean parking levels, each with 75,879 square feet, will be provided for residential parking. The parking garage accommodates spaces for bike parking, loading, and building support equipment.

MITIGATED NEGATIVE DECLARATION

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

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

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

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

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

A copy of the Initial Study/Mitigated Negative Declaration documenting reasons to support the findings is on file in the Planning Division. Mitigation measures included in the project to avoid potentially significant effects are contained on the Data Sheets on file in the Planning Division, Community Development Department,

A period of 30 days from the date of publication of the notice of the MITIGATED NEGATIVE DECLARATION will be provided to enable public review of the project specifications, the Initial Study, and this document prior to the final adoption of the MITIGATED NEGATIVE DECLARATION by the Lead Agency. A copy of the project specifications is on file in the Office of Planning Division, Community Development Department. The public review period extends from September 9, 2019 to October 9 2019.

Sheri Bermejo

Date 5 September 2019 By: _____

Sheri Bermejo
Planning Division Manager

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1 Introduction

The City of Monrovia (Lead Agency) received an application for the 127 Pomona Specific Plan. The proposed project would be developed on 1.83 acres and includes the following entitlements: Specific Plan, a Conditional Use Permit, Tentative Parcel Map No. 82520, Zoning Ordinance and Map Amendment, and General Plan Conformity findings. The approval of the application constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code [PRC], Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Section 15000 et seq.), as amended.

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

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

- Description of the project, including the location of the project (See Section 2)
- Identification of the environmental setting (See Section 2.6)
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4)
- Discussion of ways to mitigate significant effects identified, if any (See Section 4)
- Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls (See Section 2.6)
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 6)

In addition, to assist the reader, a list of mitigation measures discussed in the Initial Study is presented in Section 5.

1.1 – Documents Incorporated by Reference

CEQA Guidelines Sections 15150 and 15168(d)(2) permit and encourage an environmental document to incorporate by reference other documents that provide relevant data, which are all herein incorporated by reference pursuant to CEQA Guidelines Section 15150. This IS/MND incorporates by reference the Monrovia Municipal Code (MMC), the 2018 Bicycle Master Plan, the 2018 Parks and Recreation Master Plan, current elements of the General Plan (Land Use and Circulation Element, Housing Element 2014-2021, Open Space Element, Safety Element, and Noise Element), and the General Plan Proposed Land Use and Circulation Elements Draft Environmental Impact Report (EIR) (SCH 2007021134, certified January 15, 2008).

1.2 – Availability of Materials

All materials related to the preparation of this Initial Study/Mitigated Negative Declaration are available for public review. The documents are available at City Hall, the Monrovia Public Library, and on the City's website:

https://www.cityofmonrovia.org/your-government/community-development/planning/development-spotlight.

1.3 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study/Mitigated Negative Declaration. Such comments should explain any perceived deficiencies in the assessment of impacts, identify the information that is purportedly lacking in the Initial Study/Mitigated Negative Declaration, or indicate where the information may be found. Following a 30-day period of circulation and review of the Initial Study/Mitigated Negative Declaration, all comments would be considered by the City of Monrovia (City) prior to adoption of the MND.

Please submit comments on the Initial Study/Mitigated Negative Declaration and/or request an appointment to review related to the preparation of this Initial Study/Mitigated Negative Declaration to:

John Mayer, AICP, Senior Planner
Community Development Department
415 S. Ivy Avenue
Monrovia, CA 91016
(626) 932-5587

2 Project Description

2.1 – Project Title

127 Pomona Specific Plan and Mixed-Use Development

2.2 – Lead Agency Name, Address, and Contact Person

John Mayer, AICP, Senior Planner
Community Development Department
415 S. Ivy Avenue
Monrovia, CA 91016
(626) 932-5587

2.3 – Project Sponsor's Name and Address

Fifield Realty Corporation
1250 6th Street, Suite 403
Santa Monica, California 90401

2.4 – Required Approvals

The proposed project would require the approval of the following entitlements from the City of Monrovia:

- Specific Plan
- Conditional Use Permit
- Tentative Parcel Map No. 82520
- Zoning Ordinance and Map Amendment
- General Plan Conformity findings

The California Department of Transportation (Caltrans) is the only other public agency requiring the approvals for encroachment permits for any work within a Caltrans right-of-way.

2.5 – Native American Tribal Consultation

The AB 52 process commenced on October 15, 2018 and concluded on January 10, 2019. Six tribal governments were contacted. Of the six contacted, only one tribal government—the Gabrieleno Band of Mission Indians-Kizh Nation—requested consultation with the City. Consultation concluded on January 10, 2019. As a result of consultation, suggested mitigation measures regarding impacts to tribal cultural resources have been incorporated into this Initial Study/Mitigated Negative Declaration.

2.6 – Project Location

The project site is located in the City of Monrovia at the northeast corner of South Primrose Avenue and West Pomona Avenue, with frontage along West Evergreen Avenue. Figure 2 (Regional Context Map) shows the regional context, and Figure 3 (Vicinity Map) identifies the boundaries of the project site. The Gold Line Monrovia station is approximately 400 feet to the south of the project site. Table 2.5-1 identifies the seven parcels that compose the project site.

Table 2.6-1
Current Site Parcels (2019)

APN	Address	Area
8507-002-033	137 West Pomona Avenue	11,761.2 sf
8507-002-034	No address available	10,018.8 sf
8507-002-035	123 West Pomona Avenue	38,332.8 sf
8507-002-038	145 West Pomona Avenue	3,307 sf
8507-002-039	141 West Pomona Avenue	6,462 sf
8507-002-907	1528 South Primrose Avenue	4,119 sf
8507-002-908	1532 South Primrose Avenue	5,065 sf

Note: sf – square feet

2.7 – Environmental Setting

The 1.83-acre project site is within the City of Monrovia's Station Square Transit Village, 400 feet north of the Metro Gold Line station and 100 feet south the I-210 freeway. The project site is currently developed with two industrial buildings constructed in 1966 and 1997. Both buildings are currently occupied with light-industrial use tenants and are surrounded by paved parking lots and nonnative ornamental landscaping. Roadways abut the site on three sides; abutting the site to the east is a Chevron gas station. The project site has an elevation of 453 feet above sea level and is relatively flat with a slight north-to-south slope. See Figure 6 (Photographic Survey Map) and Figure 7 (Photographic Survey) for photos of the project site taken on October 2018.

2.8 – Surrounding Land Uses

The infill site is surrounded by commercial and industrial development to the south and west, a Chevron service station to the east, residential properties to the northwest, and Interstate 210 to the north (see Figure 3, Vicinity Map).[1] Table 2.8-1 describes the immediate land use context.

Table 2.8-1
Surrounding General Plan Designation, Zoning District, and Existing Land Uses

Direction	General Plan	Planned Development Area	Neighborhood	Zone	Existing Land Use (2019)
Project Site	*Station Square Transit Village*	Area PD – 12	Western Gateway	PD	*Light Industrial*
North	N/A	N/A	N/A	N/A	Interstate 210 Freeway
South	Station Square Transit Village	Area PD – 12	Hamby	PD	Industrial (Hamby Industrial Park)
East	Station Square Transit Village	Area PD – 12	Western Gateway	PD	Commercial (Chevron Gas Station)
West	Station Square Transit Village	Area PD – 12	Industrial	PD	High-Density Residential and Commercial

2.9 – General Plan Land Use, Zoning and Development Guidelines

The project site is designated Planned Development in the Land Use Element and on the Zoning Map. The "Planned Development" designation references the Land Use Element's Area PD-12 ("PD-12 Development Guidelines") that contain the project site's zoning and other development regulations.

Planning Context
Since 2008, the General Plan's Land Use Element and Housing Element have designated the Station Square Transit Village planning area to accommodate high-density, transit-oriented developments and affordable housing around the Monrovia Gold Line station. Since then, the context for planning in Station Square Transit Village has evolved as a result of implementation of public works programs and changes to Area PD-12 Development Guidelines.

Public Improvements
The opening of the Monrovia Gold Line Station in 2016 marked the return of active passenger rail service to Monrovia 120 years after the first station opened for Los Angeles and San Gabriel Valley Railroad. With more than 60,000 daily boardings in 2018, the Gold Line is one of the only two Metro rail lines to experience increased ridership in the past few years. Metro provided support of critical infrastructure programs within Station Square Transit Village that included the construction of the 1.7-acre Station Square Park, 0.8-acre Evergreen Plaza, the 24-acre Metro Gold Line Operations Campus, and the award-winning rehabilitation of the historic Santa Fe Depot.

Area PD-12 Amendments
The City's Redevelopment Agency, which was important to Station Square's planned growth, was dissolved by the State Legislature. Area PD-12 Development Guidelines were amended in 2014 (GPA2014-02) and 2015 (GPA2015-01) to carry out and encourage market-driven initiatives. The amendments included the repeal of the 25-acre Station Square Specific Plan, reduction of minimum development site requirements from three to two acres; increase in maximum permitted floor area as an incentive to provide parking structures; revisions to objectives; elimination and replacement of design objectives; and introduction of "neighborhoods" and its specific provisions.

Affordable Housing
The Station Square Transit Village is designated in the 2014-2021 Housing Element as a "Residential Growth Area," with a realistic capacity to accommodate 2,064 residential units available for low- to very-low-income households. As of 2019, the project and two other developments entitled or in process would contribute 41 units set aside for very-low-income households. The project contributes 13 units for very-low income levels and 12 units set aside for moderate-income households.

Transit Priority Area
SB 743, adopted in 2013, incorporated into CEQA changes to analysis of projects in areas served by transit. Public Resource Code § 21099(a)(7) defines this area "as within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

Figure 1 shows the location of the project site within a transit priority area. The project site is within a 0.5-mile radius area from the major transit stops of the Metro Gold Line and Foothill Transit Line 187 on Huntington Road. Other transit service includes the Metro bus station and the Foothill Gold Line Station, all within one-quarter-mile walking distance from the project site.

Through SB 743, infill projects within transit priority areas that meet other development and environmental impact criteria shall not consider aesthetics or parking impacts[2] or impacts caused by auto delay as significant impacts on the environment.[3] Local governments retain their ability to regulate a project's transportation, aesthetics, and parking impacts within and outside of the CEQA process.

CEQA provides other streamlining opportunities to transit-adjacent, housing developments on infill sites that are not within defined transit priority areas. Figure 1 also show the project site within a high-quality transit area defined by the Southern California Association of Government as within 0.5-mile from major transit stops and high-quality transit corridor.[4]

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[2] Public Resources Code § 21099 (d)(1). Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment

[3] Public Resources Code § 21099 (b)(2). Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.

[4] SCAG 2016-2040 RTP/SCS, Glossary, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_Glossary.pdf

Figure 1: Transit Priority Areas and High-Quality Transit Areas

Source: Southern California Association of Governments[5]

Project Objectives

The project's objectives described in the 127 Pomona Specific Plan are aligned with the City's objectives for the Station Square Transit Village planning area:

- Provide for a compact, walkable, transit-oriented development within the Station Square Transit Village.
- Reduce local contribution to greenhouse gas emissions by improving access to transit and destinations by significantly upgrading and adding to the quality, types, and convenience of access to the Gold Line station.
- Create a walkable retail environment through the addition of attractive urban spaces and ground-floor commercial uses.
- Provide signature architecture that distinguishes Monrovia and building design that has lasting value.

[5] SCAG, Data/Map Book for the City of Monrovia, November 2017, Maps: "Major Transit Stops and High-Quality Transit Corridors in City of Monrovia", http://scagrtpscs.net/Documents/DataMapBooks/Monrovia.pdf

2.10 – Project Description

The project is the 127 Pomona Specific Plan that would allow the construction of a seven-story, 347,251 square-foot mixed-use development that includes 310 multi-family residential apartments, with 25 units set aside for very-low-income and moderate-income households. Parking spaces are provided on two levels of underground parking garage and on the ground floor level. The project would include ground floor commercial space and parking areas, common and private recreation areas, and plazas accessible to the public. Approximately 80% of the floor area is residential, and 80% of the units are either studios or one-bedrooms and the remainder two-bedroom units.

The seven-story building is approximately 83 feet high, with mechanical equipment housing and roof parapets extending this height to approximately 101 feet (see Figure 5a- 5c, Elevations). The development would utilize podium construction, with the ground floor containing commercial uses and parking spaces and residential levels starting on the second story.

Table 2.10-1
Project Summary

Project Component	Characteristics	Description
Commercial Space	10,000 sf	Frontage on Pomona and Primrose
Residential Units	310 units total ・ 67 studios ・ 187 one-bedroom ・ 56 two-bedroom	25 affordable units total ・ 13 very low income ・ 12 moderate income
Open Space and Recreation Area	Approximately 51,230 sf total in public plazas and private open space ・ 7,000 sf of public plaza area ・ 18,230 sf of common open space ・ 26,000 sf in balconies and decks	
Parking	479 spaces total ・ 50 for commercial ・ 366 for residents ・ 13 for residents' guest ・ 50 for general public use 163 bike parking spaces	Two-level subterranean parking and one ground-floor level

Construction of the project would involve the demolition of two existing structures: 137 West Pomona Ave (approximately 9,490 square feet) and 123 West Pomona Avenue (approximately 15,364 square feet). The demolition would also remove improvements associated with these buildings such as paved parking areas and landscaping.

Residential
The residential density is 172 dwelling units per acre, and the residential floor area is 278,774 square feet. The 310 units include 67 studios, 187 one-bedrooms, and 56 two-bedrooms. The average unit size is 720 square feet and varies by unit type: studios 526 to 578 square feet, one-bedroom 614 to 776 square feet, and two bedroom 1,012 to 1,184 square feet. At minimum, each unit has a bedroom/living area, bathroom, and kitchen. Each floor contains at least two lobbies for multiple elevator access and

four stairs. Decks and balconies provided for 252 units distributed throughout each level of the residential building range in size from 58 square feet to 325 square feet.

Affordable Housing
Included in the project is the provision for 25 affordable housing units, with 13 units deed restricted for very-low-income households and 12 units deed restricted for moderate-income households. The project is eligible for a density/intensity bonus incentives/concessions and/or waivers of development standards that would facilitate and physically accommodate the construction of affordable housing pursuant to California Government Code Section 65915 ("Density Bonus Law"). Section 1.7 (Affordable Housing Agreement and Conditions) of the 127 Pomona Specific Plan requires that these units remain affordable for at least 55 years.

State Density Bonus law permits market rate density increases, as well as development incentives/concessions and waivers of development standards, for projects that provide certain levels of deed-restricted affordable housing. Specifically, in exchange for providing five percent of the project's base density (i.e., before the density bonus) units for very-low income households, the applicant is entitled to: 1) a 20 percent market rate density bonus above the base density, 2) one development incentive/concession, and 3) additional waivers of development standards required to physically accommodate the project.

Recreation and Public Spaces
The project incorporates on all residential and ground-floor levels approximately 51,356 square feet (1.18 acres) of recreation areas and public places. Common recreation areas total approximately 18,230 square feet, including the central courtyard with a pool on the second level, and sky decks on the seventh level. On the second level is a 1,195 -square-foot recreation rooms for fitness and other indoor activities. Private decks and balconies totaling approximately 26,000 square feet are provided for 252 units. Private and common recreation areas for residents total approximately 44,394 square feet.

Approximately 7,000 square feet of publicly accessible plaza space is located on the ground floor along West Pomona Avenue and South Primrose Avenue. A 6,250 square foot plaza would be located at the corner facing Primrose and Pomona Avenues; a 712 square foot entry residential/retail plaza faces Pomona Avenue and leads to the residential lobby and commercial area. The plaza design implements the urban design objectives of the Station Square Transit Village. The plazas are intentionally designed to encourage public use with orientation towards the station and immediately adjacent to ground-floor commercial spaces.

Commercial
The ground floor contains 10,000 square feet of commercial tenant spaces with frontages along Pomona Avenue and Primrose Avenue. The 127 Pomona Specific Plan provides dimensions for tenant spaces suitable for urban neighborhood uses such as retail, food and personal services.

Mobility and Parking
Right-of-way improvements on streets abutting the site (Pomona Avenue, Evergreen Avenue, and Primrose Avenue) would include new curb cuts, sidewalks, and streetscaping). Vehicular access to the project site would be provided through 26-foot-wide driveways, one each on Primrose Avenue and Pomona Avenue. The Pomona Avenue driveway accesses retail and public parking on the ground floor, and Primrose Avenue driveway accesses underground parking areas. Pedestrian infrastructure improvements include additional sidewalk areas of up to 12 feet in width along Pomona Avenue and Primrose Avenue and 9.75 feet on Evergreen Avenue.

The project provides 479 parking spaces within a three-level parking garage, of which 366 spaces would be assigned to the residential use, and the remainder for commercial and public parking purposes (see Figure 4b Site Plan). The ground floor contains 50 parking spaces that will be required to remain available for public use. Two levels of subterranean parking levels will contain residential parking. The parking garage also accommodates spaces for bicycle parking, loading, and building support equipment.

Bicycle parking is located on the ground floor, with a larger storage facility within the enclosed ground level and lower level parking areas. Short-term bicycle parking spaces may be also be located along the exterior of the property. The project includes 31 short-term and 163 long-term (155 assigned to residential; 8 assigned to commercial) bicycle parking spaces.

Specific Plan

The 127 Pomona Specific Plan regulates the physical components and operations of the project. As a zoning document with other land use policies and regulations incorporated, the specific plan addresses the administration of uses and activities pursued under separate permitting process from the construction of the building. These include permit and procedures for commercial and residential uses, adoption of performance standards, signs, implementation programs, screening guidelines, and parking regulations. Chapter 2 (Development Plan) establishes the regulations appropriate for a mixed-use, transit-oriented development eligible for density bonuses and other incentives of Government Code Section 65915, the State Density Bonus Law. Table 2.10-2 identifies specific plan development and design standards that regulate the size, design, and location of structures and improvements tailored for a mixed-use development within a high-density environment and consistent with the General Plan.

Table 2.10-2
Specific Plan Development and Design Standards

Development Features	Standards
Development Standards	
Building Height (maximum)	85 feet with up to 101 feet to accommodate roof projections.
Floor areas (maximum)	2nd to 7th level: 280,000 square feet Ground level: 69,000 square feet
Lot area (minimum)	1.83-acres gross.
Setback requirements	Setback requirements on the ground level are determined by the distance needed to provide sidewalks
Design Standards	
Recreation areas (minimums)	Studio and 1-bedrooms: 53 square feet/unit Two-bedrooms and above: 60 square feet/unit
Commercial spaces	Every 50 feet of commercial frontage must be provided with public access. Minimum interior floor-to- ceiling height of 12 feet and must have a minimum horizontal depth of 45 feet. At least 75% of the combined commercial frontage area must be transparent, individual commercial space must be at least 60% transparent
Public plazas	Minimum 8% of the development site
Materials and finishes	Prohibit the use of reflective glass, metallic, and other highly reflective and glare producing materials

Vesting Tentative Parcel Map

A Vesting Tentative Parcel Map (VTPM No. 82520) is proposed to consolidate the project site's seven parcels into one 1.8-acre parcel.

Utilities and Infrastructure

The proposed project would connect to existing water and sewer facilities located within adjacent rights-of-way. The City of Monrovia is the project's service provider for water, wastewater, sewer, law enforcement, fire and emergency, and library services. Water and sewer lines are located under West Pomona Avenue, South Primrose Avenue, and West Evergreen Avenue. Electrical services would be provided by Southern California Edison. The site would accommodate electrical, data, and communications upgrades pursuant to the requirements of their respective providers. Gas services would be provided by SoCal Gas Company. Gas company improvements include facility improvements, abandonments, and relocations as necessary. Mechanical equipment such as air conditioning, solar zones, elevator and stairwell shaft are on the roof level, and a ground floor transformer would be located along West Pomona Avenue.

Construction Schedule

The construction schedule is 26 months, anticipated to begin in 2020.

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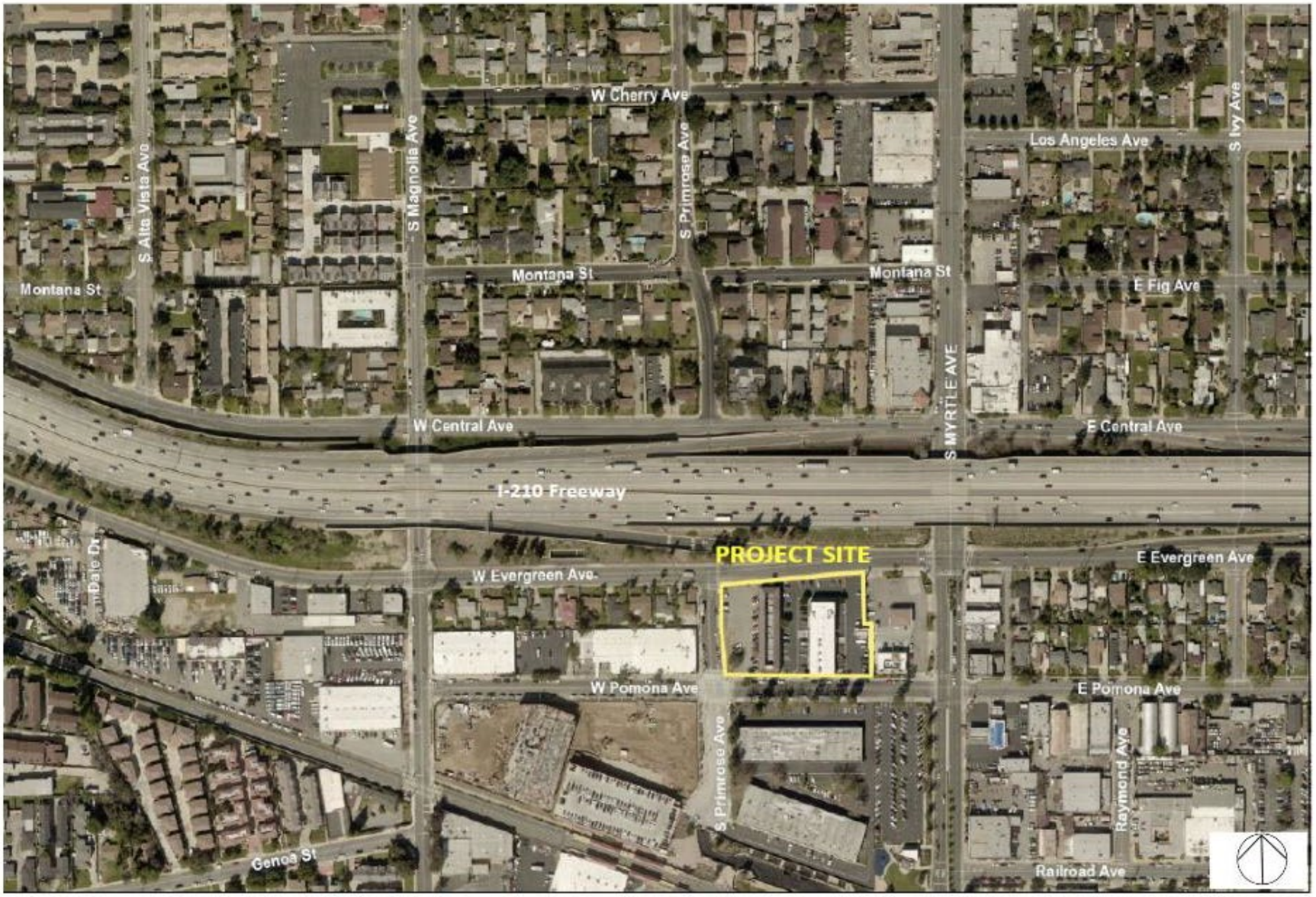

Figure 2: Regional Location and Context

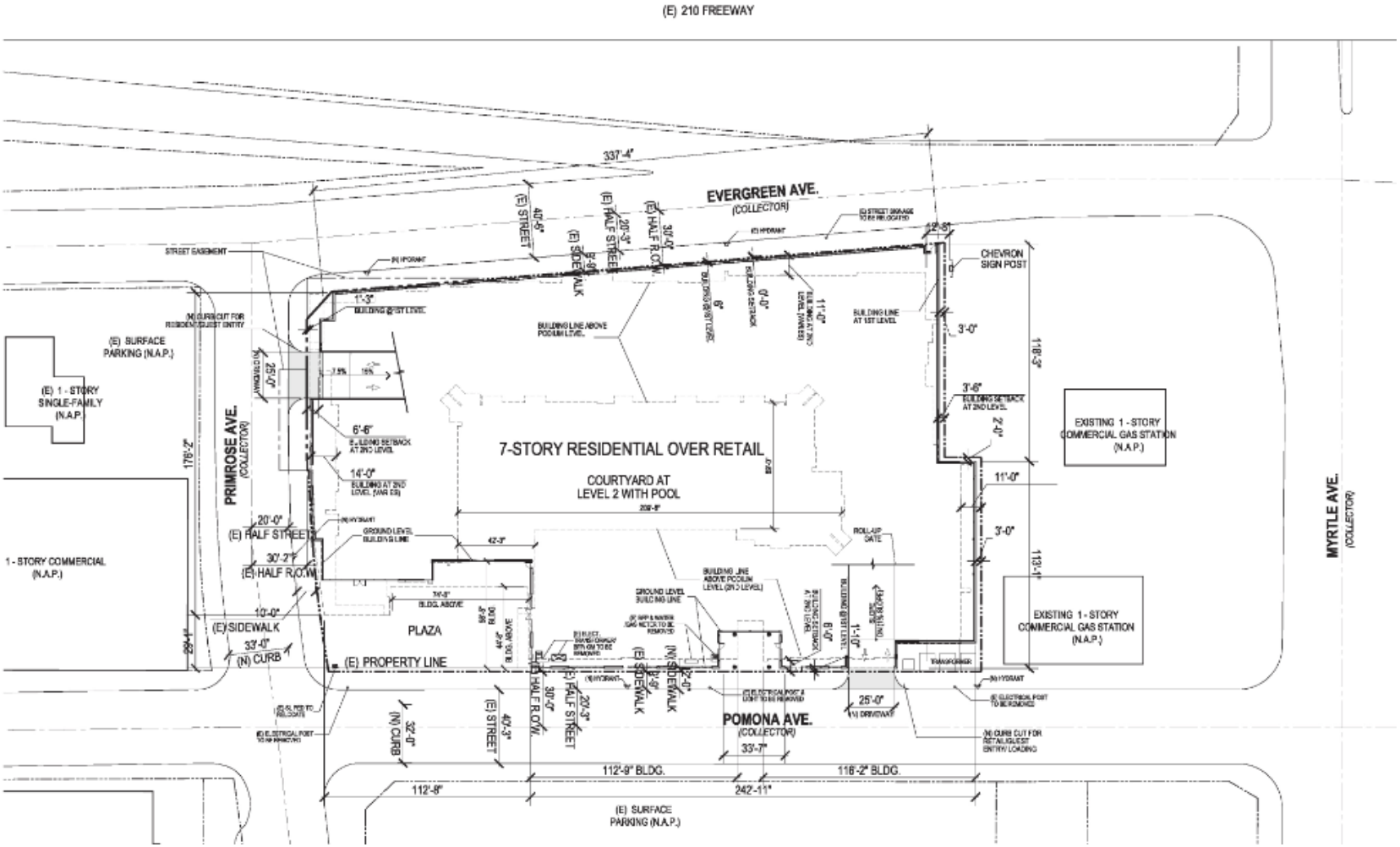

Figure 3: Site Plan

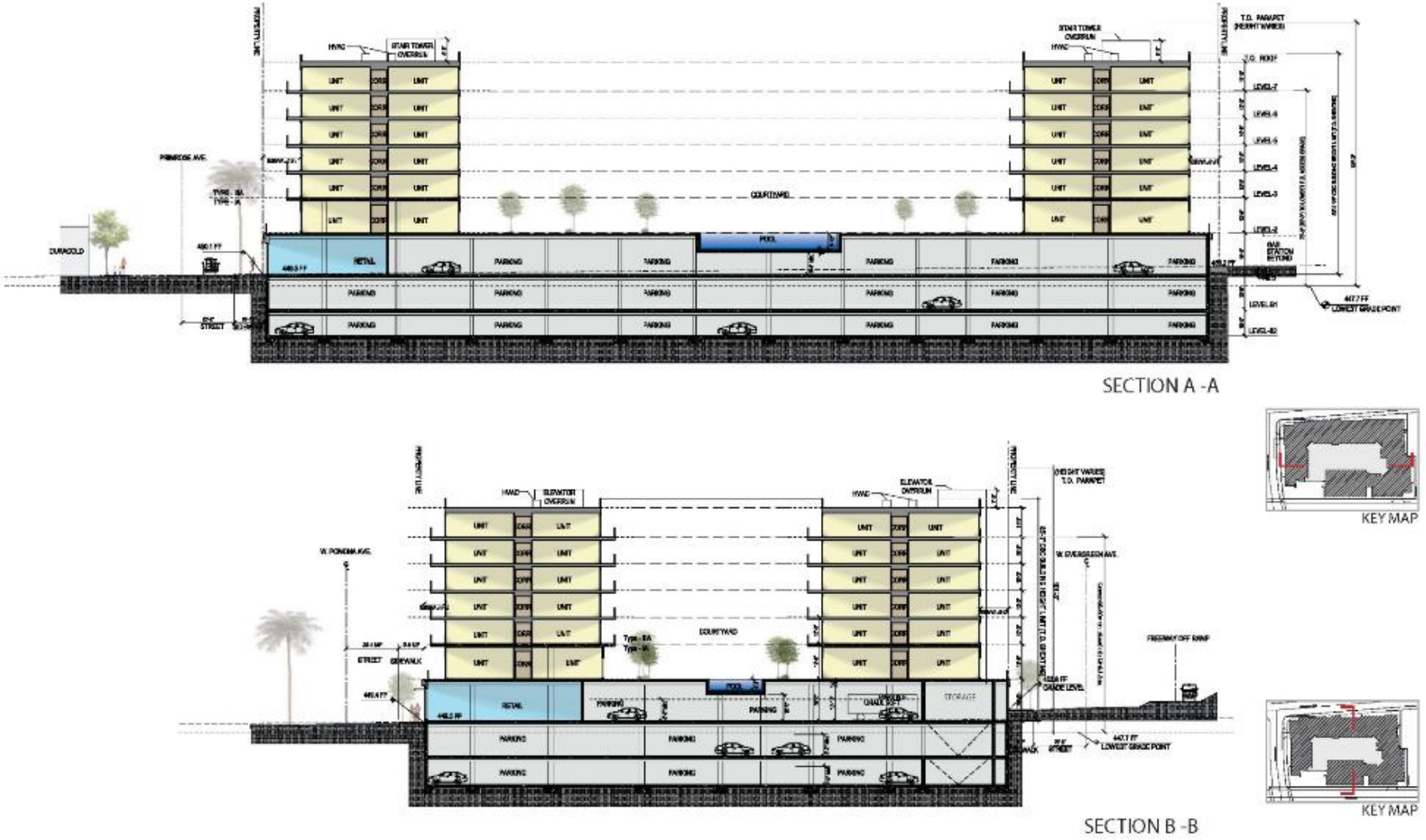

Figure 4a: Sections

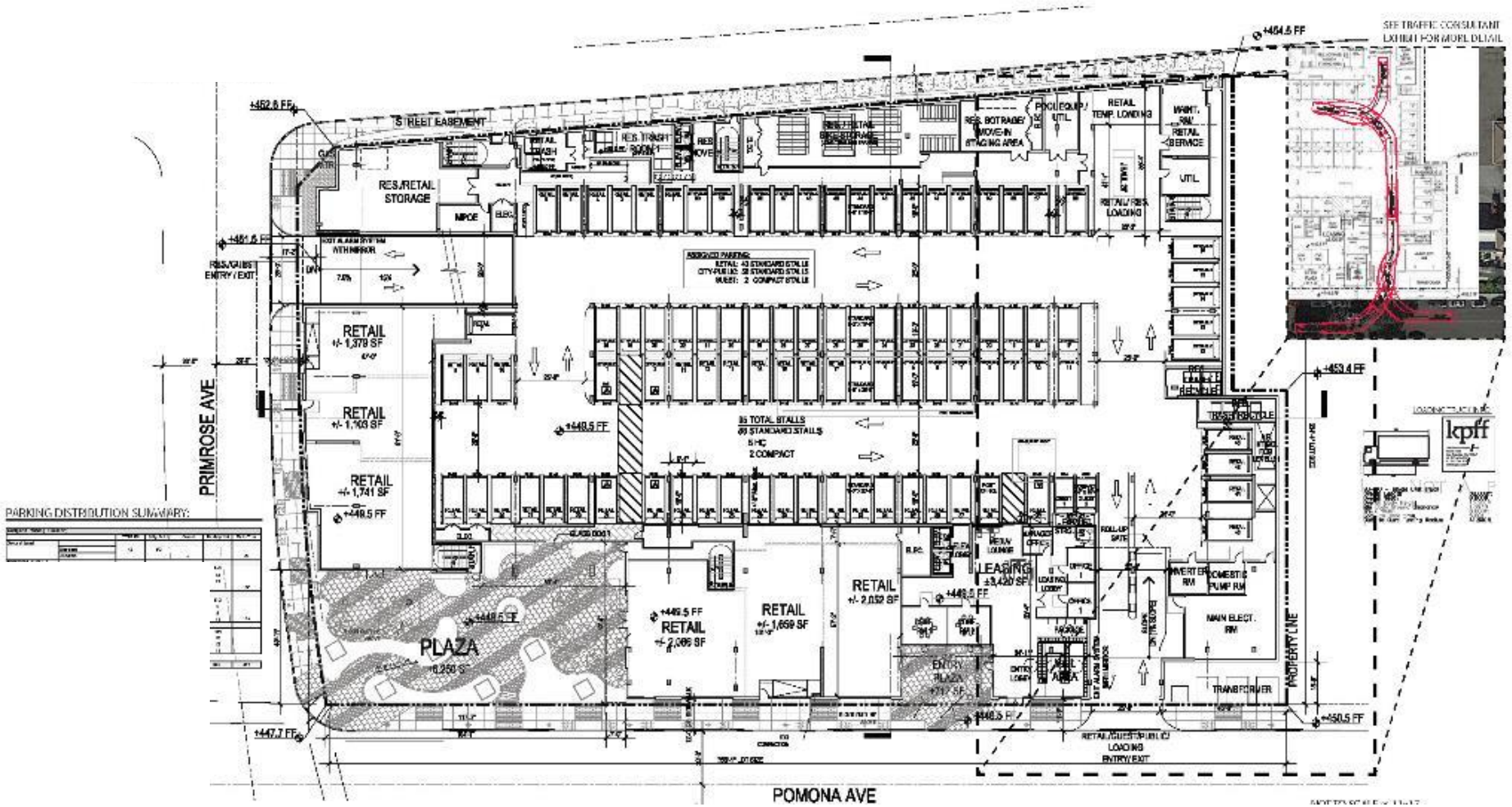

Figure 4b: Ground-floor Plan

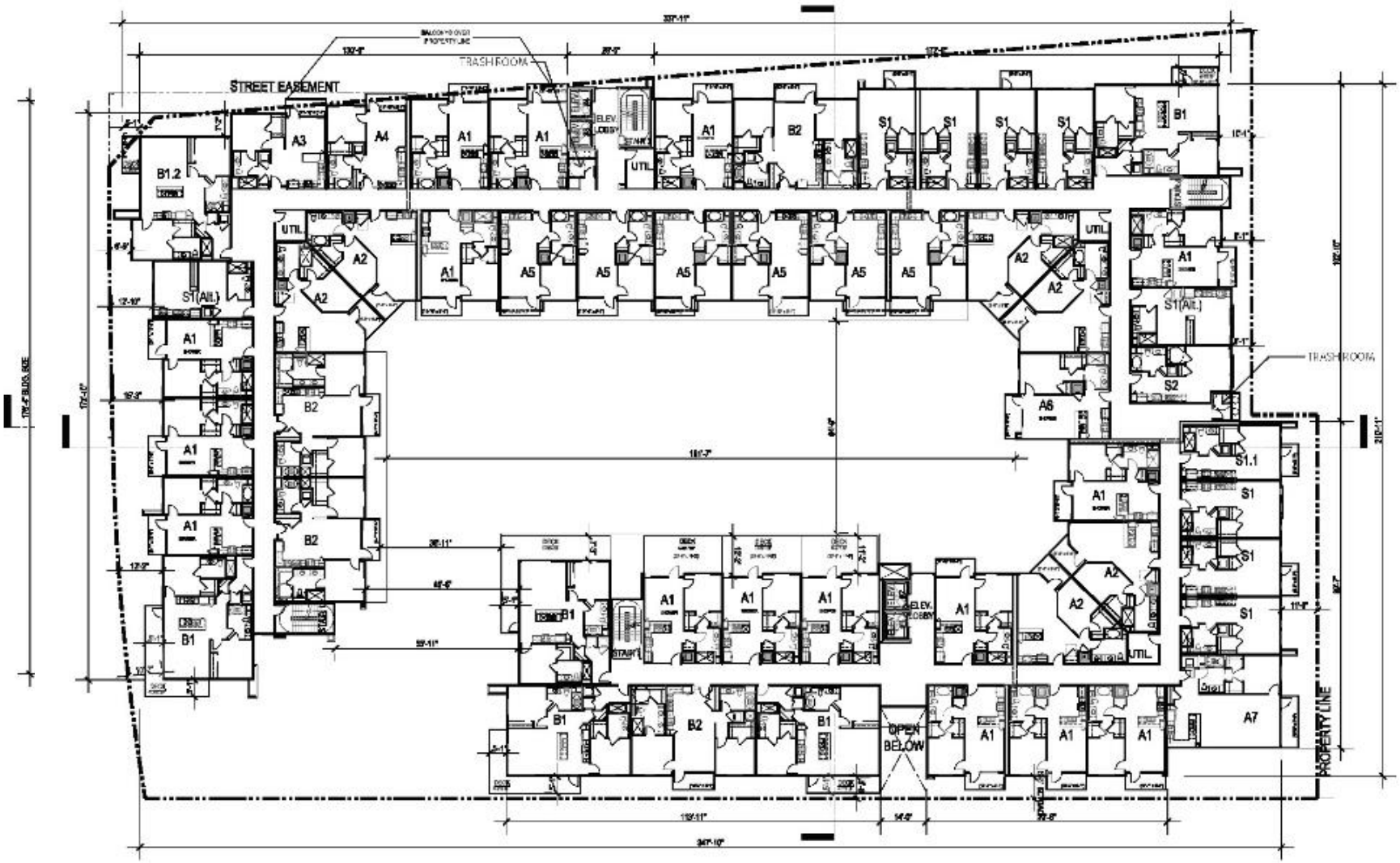

Figure 4c: 2nd Level Plan

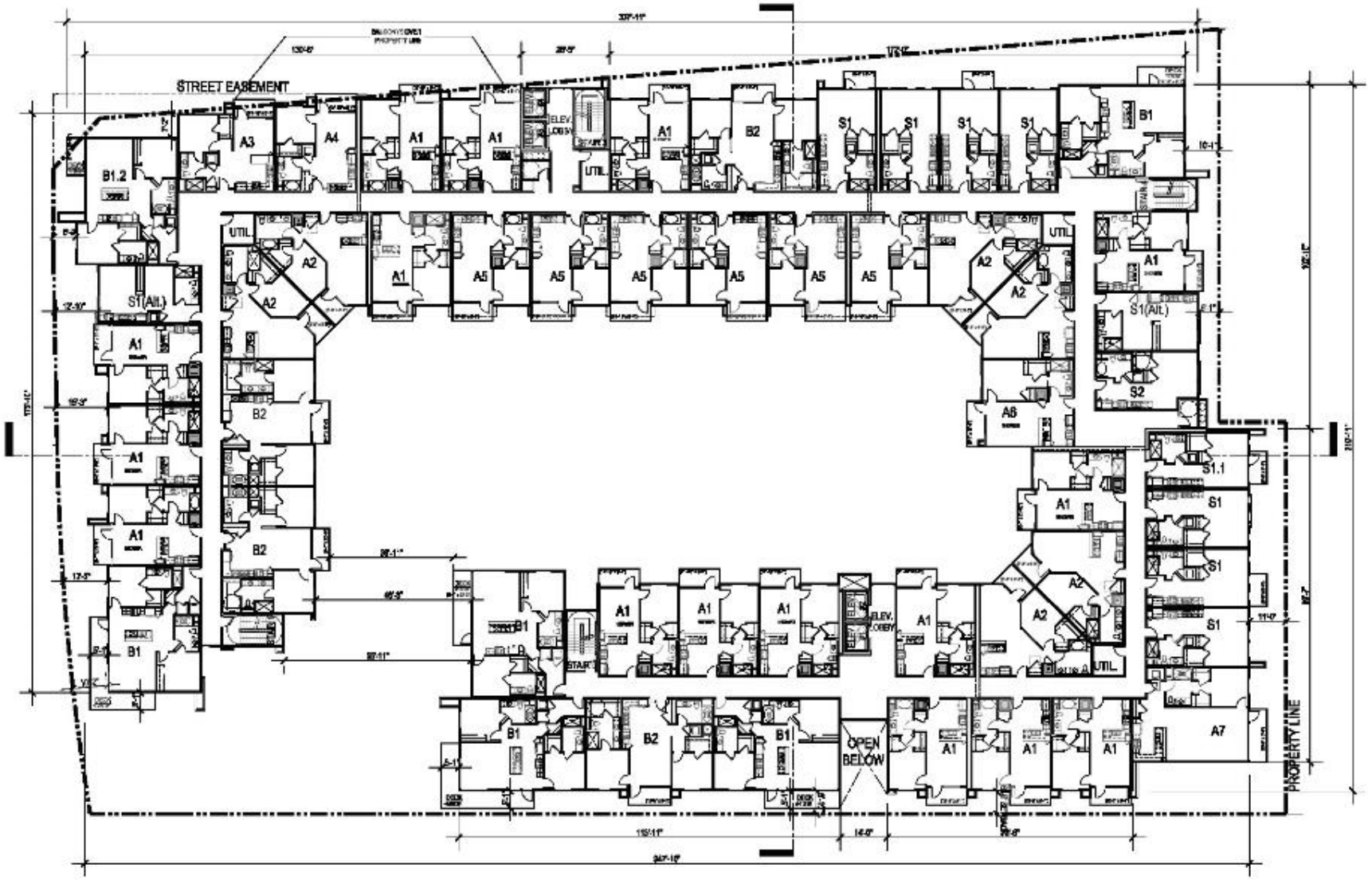

Figure 4d: 4th to 6th Level Plan

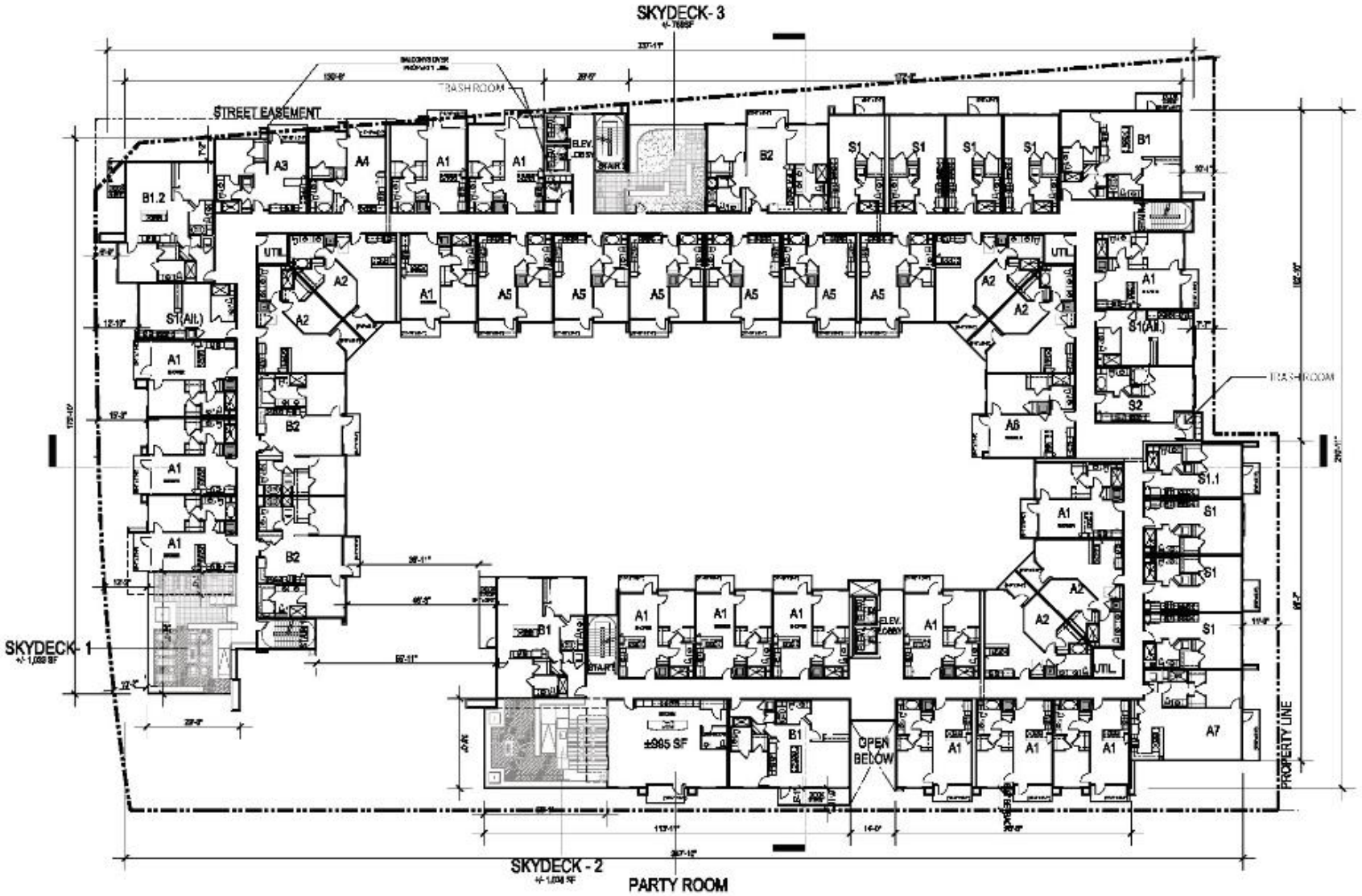

Figure 4e: 7th Level Plan

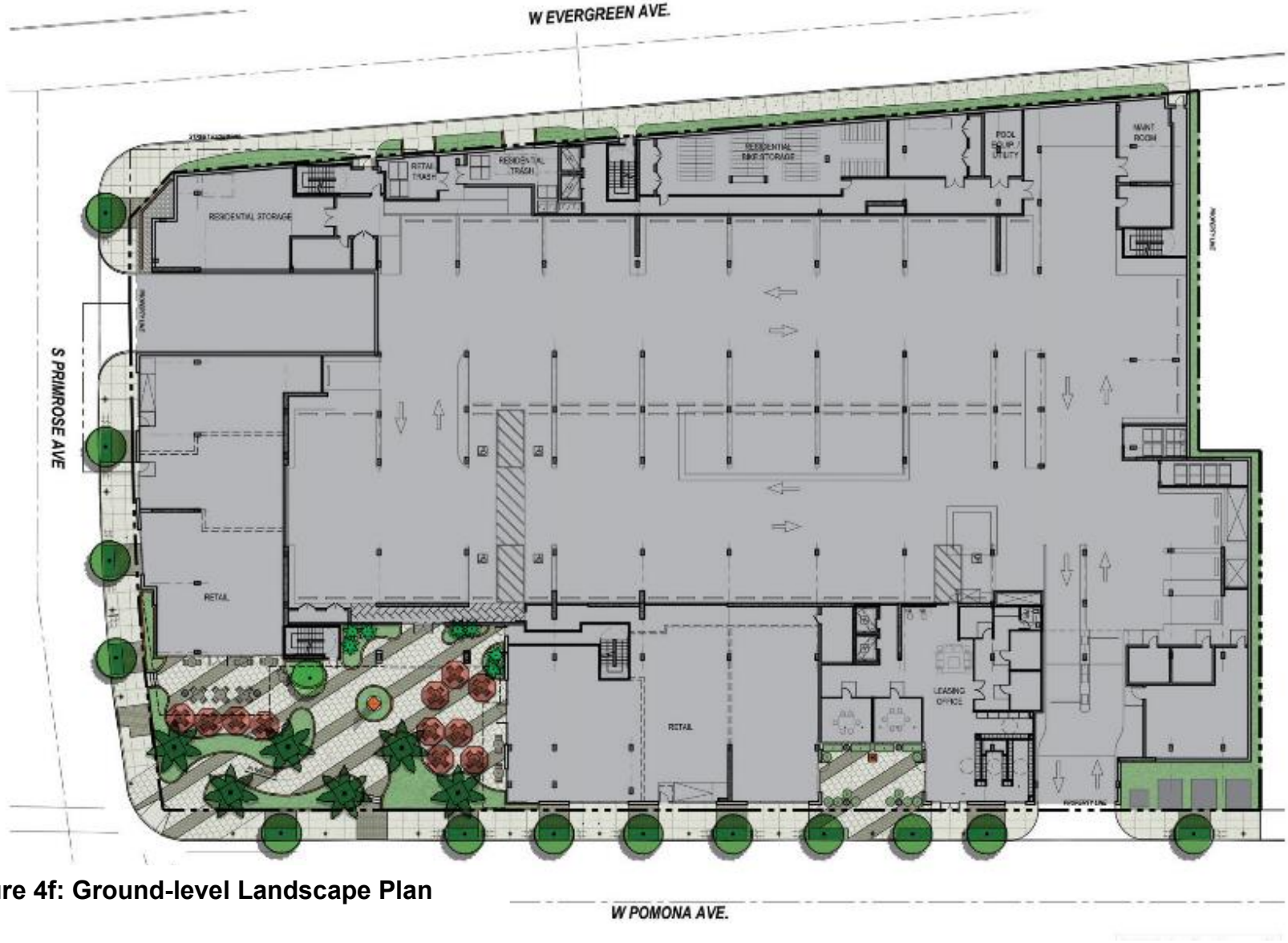

Figure 4f: Ground-level Landscape Plan

Figure 5a: South and West Elevations

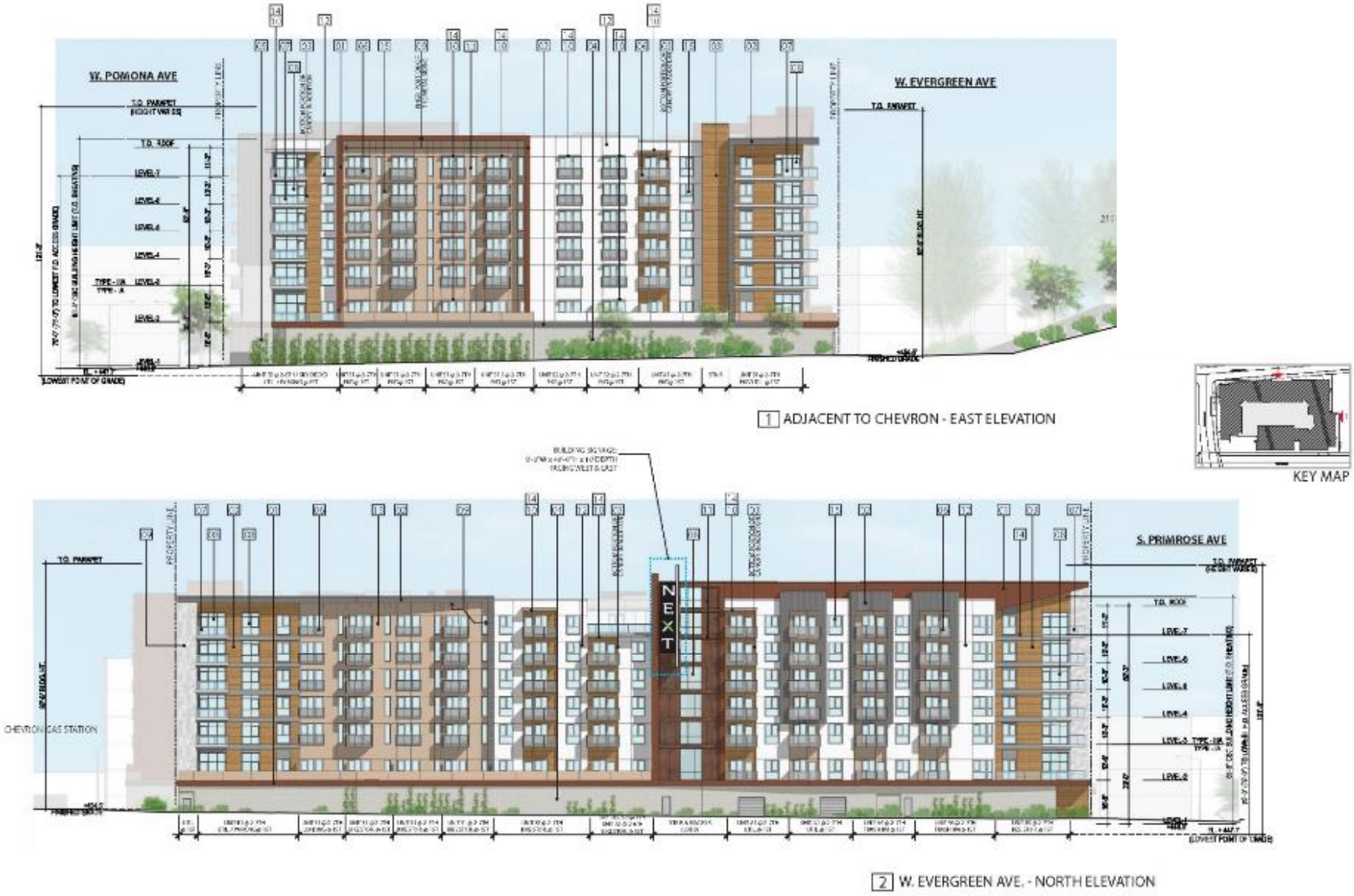

Figure 5b North and East Elevations

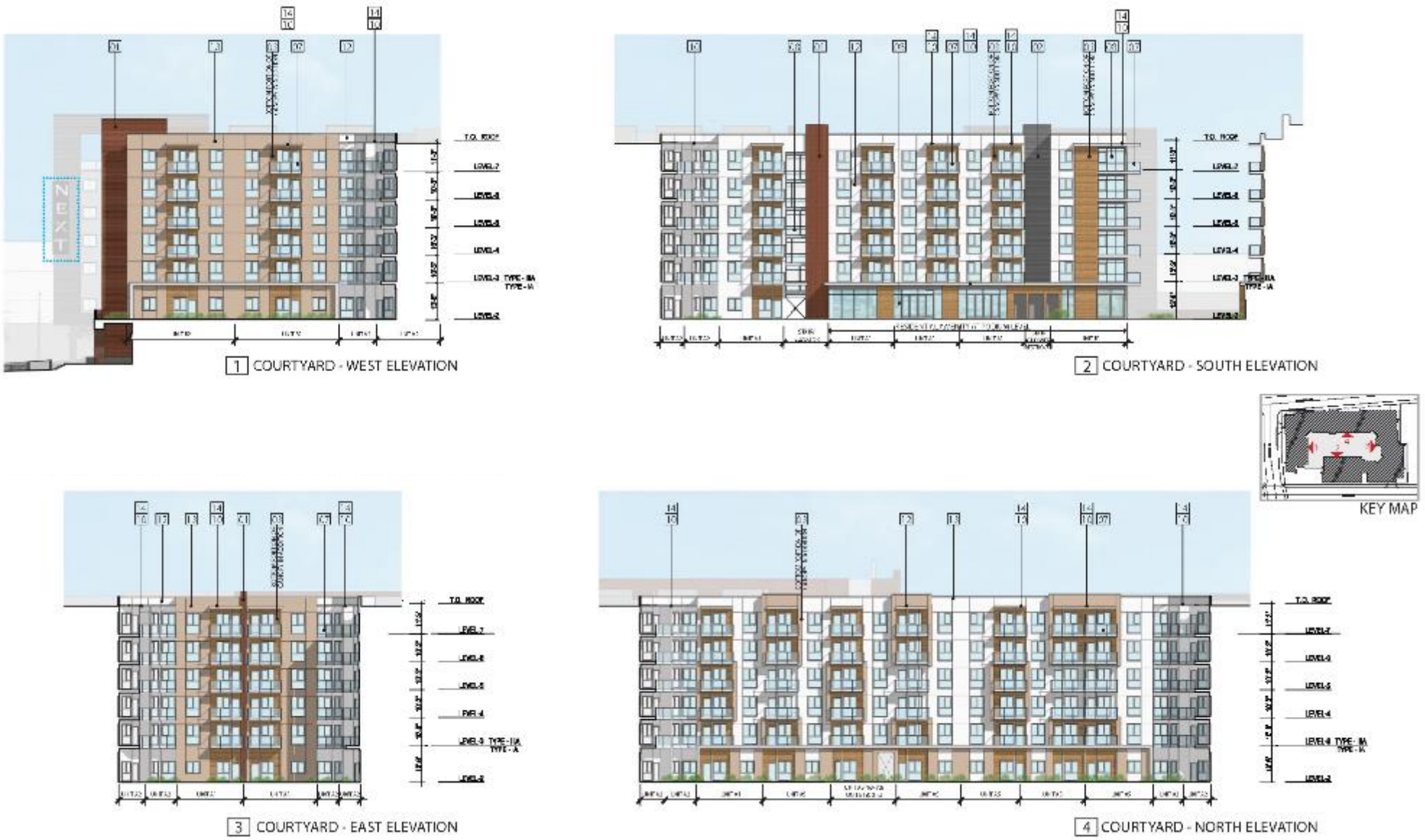

Figure 5c: Interior Courtyard Elevations

Figure 6: Photograph Location Map

PHOTOGRAPH 1 - 123 West Pomona Avenue view of Project Site.

PHOTOGRAPH 2 - Portions of the Project Site.

Figure 7a: Photographs of Project Site

PHOTOGRAPH 3 - South view of Project Site along West Evergreen Avenue.

PHOTOGRAPH 4 - West view of the Project Site along South Primrose Avenue.

Figure 7b: Photographs of Project Site

3 Determination

3.1 – Environmental Factors Potentially Affected

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

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

3.2 – Determination

□	The Lead Agency finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☑	The Lead Agency finds 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.
□	The Lead Agency finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
□	The Lead Agency finds 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.
□	The Lead Agency finds 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.

4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Public Resources Code Section 21099(d)(1), which pertains to Transit Priority Areas, states that the aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered a significant impact on the environment. Public Resources Code Section 21099(d)(2) (A) goes on to state that this subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetics impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. Except as provided in Public Resources Code Section 21099, would the project:

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

a) **No Impact.** The proposed project is located in an urbanized area of the City of Monrovia. The site has limited views of the San Gabriel Mountains to the north. Views of the San Gabriel Mountains are partially obscured by street trees, landscaping, buildings, and the freeway embankment. Due to its distance from the mountains and surrounding urban character of the area, the site is not afforded any unobstructed natural views of rock outcrops or scenic features. The proposed project would not have a substantial adverse effect

on a scenic vista, as the project vicinity is an urbanized environment that does not afford expansive scenic views. The mixed-use building would be seven stories in height, which is taller than existing structures near the project site. The building would block some street views of the San Gabriel Mountains, primarily between buildings on South Primrose Avenue and West Pomona Avenue. However, the project would not have a substantial adverse effect on views of the San Gabriel Mountains due to the height and the distance of the mountains. While the proposed building may affect views of the mountains from areas immediately adjacent and south of the building, the panoramic view of the mountains would not be obstructed. Therefore, no impact would occur.

b) No Impact. The proposed project is not adjacent to a designated state scenic highway or eligible state scenic highway identified by the California Scenic Highway Mapping System.[6] The City of Monrovia has no local scenic roadways designated in the General Plan. The project site is located on a previously developed site in a currently urbanized area of the City and contains no scenic resources, such as a significant trees or unique rock outcropping. Therefore, the proposed project would result in no impact to scenic resources. No impact would occur.

c) Less Than Significant Impact. The project site is located within an urbanized setting within the City, and within the proximity to other similar transit-oriented development (TOD). The scale and style of the proposed project are consistent with the Gold Line Station area's general transition to a mix of multi-family residential, office, retail/dining, hospitality, and transit station uses near the Monrovia Gold Line Station. Page 52 of the Land Use Element of the City's General Plan, describes, "…the City identified the area south of I-210 as an opportunity to encourage transit-oriented development that could serve as a model for transit development in southern California." The location of the project site south of I-210 increases the suitability of the site for transit station uses as well.

However, the project site is part of a neighborhood that currently comprised of primarily post-World War II one- to two-story buildings. Required development standards under the Specific Plan and design review of the proposed project ensure that the development is designed in a manner to soften the transition between adjacent uses. The 127 Pomona Specific Plan includes landscape design objectives and measures to buffer and screen the proposed development to minimize aesthetic impacts on the adjacent uses. With implementation of these standard conditions and review procedures, impacts of the propose project on the visual character of the area would be less than significant.

Use of noise barriers and/or walkways during construction of the proposed project has the potential to affect the visual character of the area over the short term should the construction barriers or walkways not be properly maintained (e.g., become sites of graffiti or trash). Short-term impacts would be potentially significant. However, standard conditions the City applies, as outlined in SC AES-1 would ensure that construction barriers and/or walkways are maintained and that any inappropriate material is removed.

[6] California Department of Transportation. California Department of Transportation, California Scenic Highway Mapping System. Website:

Standard Condition

SC AES-1: Maintenance of Construction Barriers. Prior to issuance of any construction permits, the City of Monrovia 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."
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

d) Less Than Significant Impact.

Development of the proposed project could produce new sources of light and/or glare that may potentially cause significant impacts during the daytime and/or nighttime. This is especially important given the proximity of the proposed project to I-210. Impacts associated with glare range from simple nuisance to potentially dangerous situations (e.g. if glare is directed into the eyes of motorists). New development could introduce inappropriate lighting and/or use building materials that could cause inappropriate glare in the planning area. Such impacts can include but are not limited to:

- Excessive or inappropriately directed lighting that can adversely impact nighttime views by reducing the ability to see the night sky and stars
- Glare caused from unshielded or misdirected lighting sources, such as a floodlight attached to the side of a single-family residence that could be oriented to shine into a neighbor's house
- Reflective surfaces (e.g., polished metal) or reflective windows that can also cause glare

MMC Section 17.32.080 requires that lighting, where provided to illuminate private property, be arranged to reflect away from adjoining property or any public way and be arranged in a manner not to cause a nuisance either to highway traffic or the living environment. Buildout of the proposed project is required to comply with this standard. In addition, the City's design review process would ensure that these standards would be complied with and that reflective building materials that would introduce a source of glare would not be utilized. The 127 Pomona Specific Plan Section 2.3.1 (Performance Standards) incorporates MMC Chapter 17.32 requirement to reduce light pollution. Specific Plan Section 2.7.5 prohibits the use of reflective glass, metallic, and other highly reflective and glare producing materials. Compliance with these standards or requirements would avoid any potential adverse lighting effects.

Other sources of light associated with the proposed project (e.g., pathway lighting, lighting of signage) have the potential to indirect light inappropriately. Therefore, development of the proposed project could generate a significant impact on aesthetics and visual resources in relation to glare and lighting if mitigation measures are not implemented. As a standard project condition, the City requires approval of a lighting plan to avoid such affects. Standard conditions SC AES-2 and SC AES-3 would be applied to the project. Impact would be less than significant.

A shadow study was conducted for the proposed project to determine effects of the proposed project on adjacent properties. Table 4.1-1 identifies the length of shadow corresponding to specific time of day and events. Figures 8a and 8b show the assessment results, which suggest that shadowing onto other buildings would not occur for much of the year and for most of the day during the solstice period (Figure 8b). Therefore, the proposed project's effects related to shadow/shade impacts would be less than significant.

Table 4.1-1
Shadow/Shade Analysis

Time Period	Time of Day	Length of Shadow
Winter Solstice	9:00 AM	234 feet
	12:00 PM	102 feet
	3:00 PM	177 feet
Vernal Equinox	9:00 PM	96 feet
	12:00 PM	53 feet
	3:00 PM	115 feet
Summer Solstice	9:00 AM	55 feet
	12:00 PM	20 feet
	3:00 PM	75 feet
	6:00 PM	390 feet
Autumnal Equinox	9:00 AM	96 feet
	12:00 PM	61 feet
	3:00 PM	140 feet
	6:00 PM	440 feet
Source: Humphreys & Partners Architects 2018		

Standard Conditions

SC AES-2: Project lighting shall be directed and shielded to focus illumination on the desired areas only and avoid light trespass into adjacent areas. Reflective glass, metallic, and other highly reflective and glare producing materials shall not be used in new building construction.
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

SC AES-3: 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 [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, onsite 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 onsite lighting shall be shielded and confined within site boundaries.
- No direct rays or glare shall be 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.

Requirements and Timing: The Lighting Plan shall be reviewed and approved prior to issuance of building permits. **Monitoring:** The City's Community Development Director, or designee, shall review and approve the lighting plan prior to issuance of building permits.

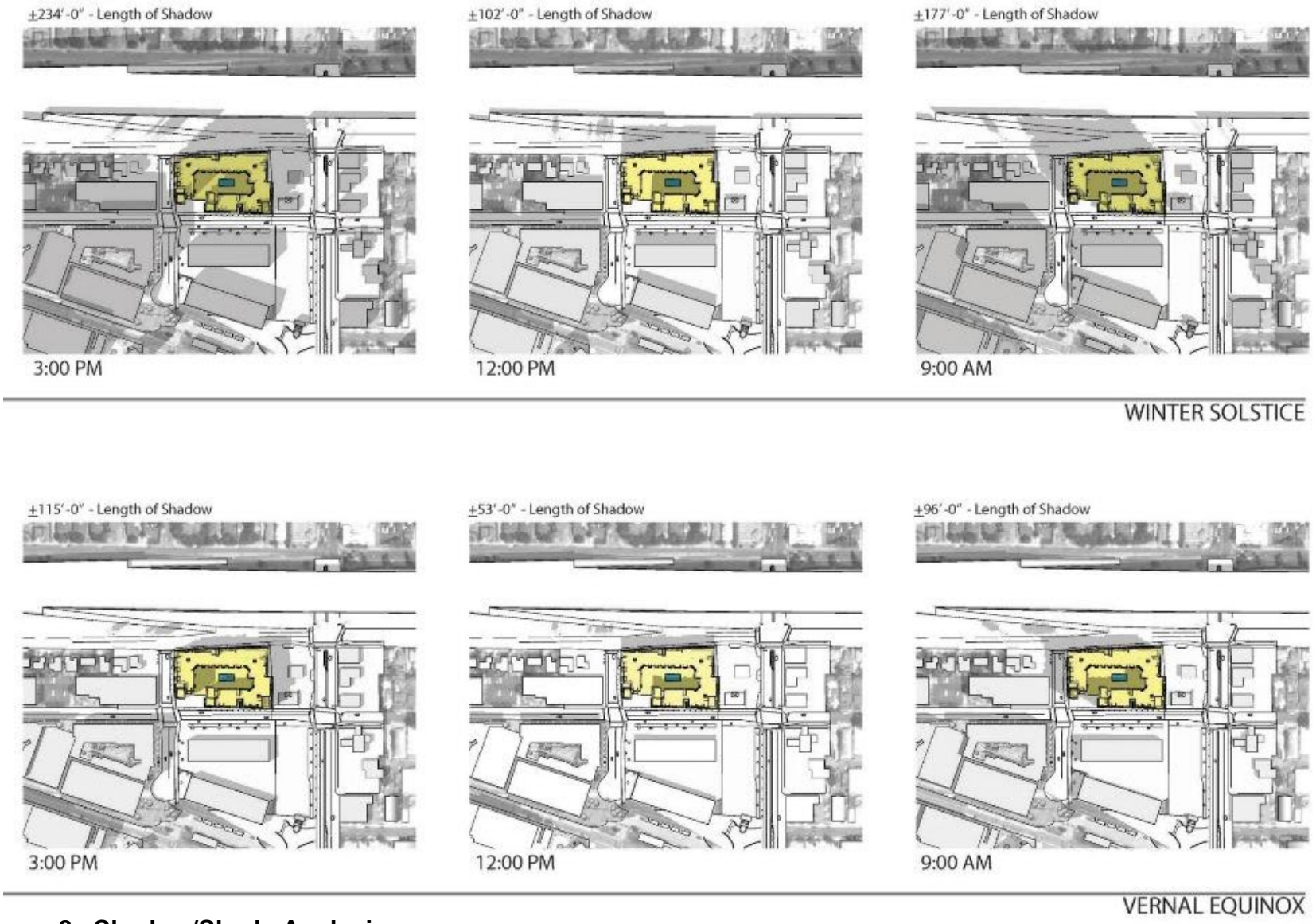

Figure 8a Shadow/Shade Analysis (Winter/Vernal)

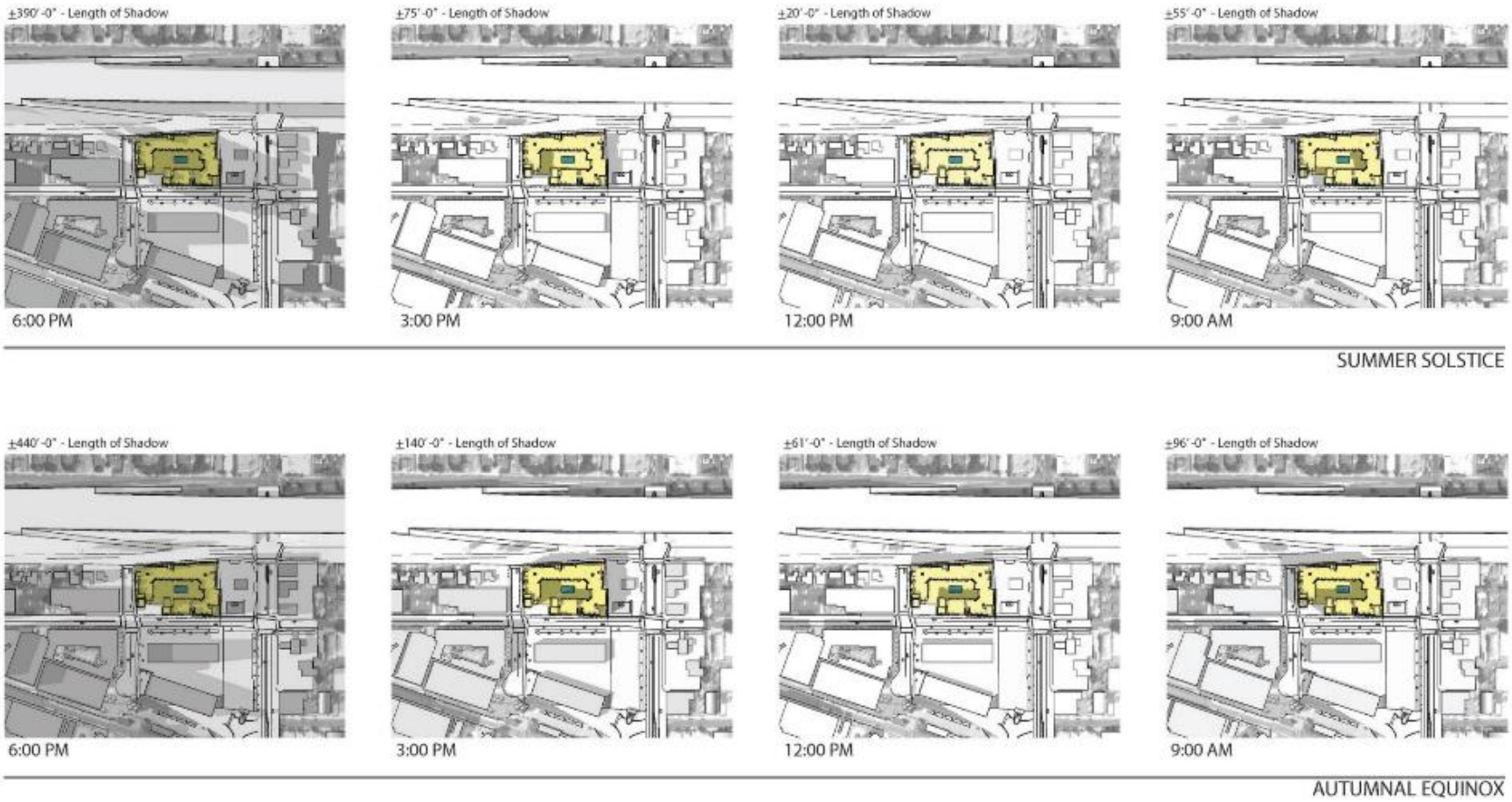

Figure 8b Shadow/Shade Analysis (Summer/Autumnal)

4.2 – Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	□	□	□	☑
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	□	□	□	☑
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	□	□	□	☑
d) Result in loss of forest land or conversion of forest land to non-forest use?	□	□	□	☑
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	□	□	□	☑

a) **No Impact.** The project site is fully developed and according to California Department of Conservation soils maps, does not contain any Prime Farmland, Unique Farmland, or Farmland of

statewide importance. The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance farmland. Therefore, the proposed project would have no impact.

b) **No Impact.** The proposed project site does not contain any land zoned for agricultural use or any land in a Williamson Act Contract.[7] No impact would occur.

c) **No Impact.** The proposed project site is fully developed and does not contain any parcels zoned for forest use; therefore, the proposed project would not cause rezoning of forest land, timberland. No impact would occur.

d) **No Impact.** The proposed project site is developed and does not contain any forest land. Therefore, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) **No Impact.** The proposed project site does not contain any farmland or land zoned for farm use. The project would not result in changes to the environment which would result in the conversion of farmland to non-agricultural use nor conversion of forest land to non-forest use. No impact would occur.

[7] https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2010-2012/FCR/FCR%202015_complete.pdf

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Analysis of air quality impacts is based on the Air Quality and Greenhouse Gas Report contained in Appendix A. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	□	□	☑	□
b) Result in a cumulatively considerable net increase of any criteria pollutant under an applicable federal or state ambient air quality standard?	□	☑ □		□
c) Expose sensitive receptors to substantial pollutant concentrations?	□	□	☑	□
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	□	□	☑	□

The methodologies and assumptions used in preparation of this section follow the CEQA Guidelines developed by the South Coast Air Quality Management District. Information on existing air quality conditions, federal and state ambient air quality standards, and pollutants of concern was obtained from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and SCAQMD. Information on the potential amount of air pollutants that could be generated by the project was obtained from an *Air Quality and Greenhouse Gas Analysis and Health Risk Assessment* prepared for the project (MIG 2019a and 2019b). See Appendices A and J, respectively.

a) **Less than Significant Impact.** A project that conflicts with or obstructs the implementation of the South Coast Air Quality Management District's (SCAQMD) South Coast Air Basin 2016 Air Quality Management Plan (AQMP) could hinder implementation of the AQMP, delay efforts to meet attainment deadlines, and/or interfere with SCAQMD efforts to maintain compliance with, and attainment of, applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD *CEQA Air Quality Handbook*, consistency with the AQMP is affirmed when a project: (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP.

As described in Section 2.1.3 of the Air Quality and Greenhouse Gas Report, the proposed project site is within the South Coast Air Basin, which is under the jurisdiction of the SCAQMD. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook*, consistency with the AQMP is affirmed if the project:

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

Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the 2016 AQMP. The 2016 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards because this growth is included in the projections used to formulate the AQMP. Therefore, if the growth allowed by the project would be consistent with the regional population, housing, and employment forecasts identified by SCAG in the RTP/SCS, plan implementation would be consistent with the AQMP even if emissions could potentially exceed the SCAQMD's recommended daily emissions thresholds.

The 127 Pomona Specific Plan project would result in 310 residential units and 10,000 square feet of commercial space. These development capacities would support an estimated 570 residents and 18 employees as shown in Table 4.3-1.[8] The 2016-2040 RTP/SCS population and employment projections for the City of Monrovia, as well as the increase in population and employment that would occur with the implementation of the project and other projects currently under review, are shown in Table 4.3-1.

[8]City of Monrovia 2018 and SCAG 2016-2040 RTP/SCS

Table 4.3-1
RTP/SCS and 127 Pomona Avenue Specific Plan Growth Assumptions

	Population	Employment
Proposed Project		
127Pomona Avenue Specific Plan	570(A)	18(B)
Other City Projects		
Other Past, Present, and Future Projects	2,837(C)	546D)
Total Growth	**3,407**	**564**
RTP/SCS Growth 2016 - 2040	**3,500**	**3,600**
Within Growth Assumptions?	**Yes**	**Yes**

Source: City of Monrovia 2018 and SCAG 2016, modified by MIG

(A) According to the U.S. Census Bureau, the average persons per bedroom in Monrovia are 1.536. Given this, under the scenario of 310 units, the 127 West Pomona Avenue Mixed-Use Project would accommodate 570 residents: (Studio: 67 x 1 x 1.536 = 103; 1 Bedroom: 182 x 1 x 1.536 = 280; 2 Bedrooms: 61 x 2 x 1.536 = 187).

(B) Based upon the U.S. Green Building Council's (2008) average SF/employee: Retail is 10,000 square feet (SF)/550 SF/employee = 18 employees.

(C) According to the City's cumulative project list, approved, under-construction, or reasonably foreseeable residential projects (or portions of mixed-use projects) would result in 1,539 new dwelling units in the City. Assuming 20% of these are 2-bedroom units would yield 1,847 bedrooms. Based on the U.S. Census Bureau estimate of 1.56 people per bedroom, the population growth from other City residential projects would be equal to 1,847 * 1.536 = 2,836.7 people.

(D) According to the City's cumulative project list approved, under-construction, or reasonably foreseeable non-residential projects (or portions of mixed-use projects) would result in approximately 43,000 SF of office space, 68,000 SF of hotel space, and 181,000 SF of retail space. Based upon the U.S. Green Building Council's (2008) average SF/employee: General Office is 43,000 square feet (SF)/250 SF/employee = 172 employees, for Hotel is 68,000 SF/1,500 SF/employee = 45.3 employees, and General Retail (100,000 SF or less) is 181,000 SF/550 SF/employee = 329 employees. This yields a total employee population of 546.3

As shown in Table 4.3-1, implementation of the proposed project, along with other projects in Monrovia recently approved or currently under review, would not exceed the growth assumptions contained in the AQMP. Further, implementation of the proposed project would encourage transit-oriented development and support the use of mass transit. Thus, the proposed project would support AQMP objectives to reduce trips and would aid in the implementation of the AQMP.

Consistency Criterion 2 refers to the California Ambient Air Quality Standards CAAQS. SCAQMD has identified carbon monoxide (CO) as the best indicator pollutant for determining whether air quality violations would occur since it is most directly related to automobile traffic, the emissions of which have been modeled by the SCAQMD to determine future air quality conditions. The CO hotspot analysis described below indicates that the proposed project would not result in a localized CO hotspot and therefore, would not cause or contribute to an existing or projected air quality violation. In addition, as described in Section 5.3 and 5.51 of the Air Quality and Greenhouse Gas Report, the construction and operation of the proposed project would not exceed SCAQMD regional or localize significance thresholds. For the reasons described above, the proposed project would not conflict with the SCAQMD 2016 AQMP.

b) **Less than Significant Impact with Mitigation Incorporated.** The project site is located within the South Coast Air Basin (Basin), where efforts to attain state and federal air quality standards are governed by the SCAQMD. Both the State of California and the federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as *criteria pollutants*). These pollutants include ozone (O_3), CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM^{10}), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within

a reasonable margin of safety. Where the state and federal standards differ, California AAQS are more stringent than the national AAQS.

The U.S. EPA, CARB, and the SCAQMD assess the air quality of an area by measuring and monitoring the amount of pollutants in the ambient air and comparing pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into attainment status categories in Table 4.3-2.[9]

Table 4.3-2
South Coast Air Basin Attainment Status

Pollutant	Federal	State
-O_3 (1-hr)	Nonattainment	Nonattainment
O_3 (8-hr)	Nonattainment	Nonattainment
PM_{10} (24-hr and Annual)	Attainment	Nonattainment
$PM_{2.5}$ (24-hr)	Nonattainment	--
$PM_{2.5}$ (Annual)	Nonattainment	Nonattainment
CO	Attainment (Maintenance)	Attainment
NO_2 (1-hr)	Attainment	Attainment
NO_2 (Annual)	Attainment (Maintenance)	Attainment
SO_2	Attainment	Attainment
Lead	Partial Nonattainment	Attainment
Visibility Reducing Particles	--	Unclassified
SO_4	--	Attainment
H_2S	--	Attainment
Source: SCAQMD, 2018		

The proposed project would generate both short-term construction emissions and long-term operational emissions. The project's potential emissions were estimated using CalEEMod, V. 2016.3.2. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed SCAQMD-recommended pollutant thresholds.

Construction Emissions

As described in Section 4.1.1 of the Air Quality and Greenhouse Gas Report, the proposed project involves the construction of a seven-story mixed-use development consisting of approximately 10,000 square feet of ground-floor commercial floor space and 310 residential units. The proposed project also includes three levels of enclosed parking, with two levels below ground and one level at grade. Construction activities would disturb a total of approximately 1.83 acres of land and include demolition, site preparation, grading, construction, paving, and architectural coating work. Site preparation would include removal of demolition material, leveling soil, and preparing site for construction.

[9] SCAQMD 2018. National Ambient Air Quality Standards and California Ambient Air Quality Standards Attainment Status for South Coast Air Basin. SCAQMD, Air Quality. September 2018. Web. December 2018. http://www.aqmd.gov/home/air-quality/clean-air-plans

The proposed project's potential construction emissions were modeled using CalEEMod, Version 2016.3.1 (see Appendix A). The project's construction activities, duration, and typical equipment usage was generated using CalEEMod, V. 2016.3.2 and are shown in Table 4-3; the type and amount of equipment used during construction was generated using CalEEMod default assumptions and modified as necessary to reflect additional-project specific construction activities, including:

- Demolition of approximately 39,500 square feet of existing building space and associated debris hauling activities.
- Export of 80,000 cubic yards of soil during the project's grading phase.
- Site preparation includes the removal of remaining debris from demolition, the leveling of soil, and movement soil and fill material onsite construction activities were presumed to start in January 2020 and last approximately 26 months.

Table 4.3-3
Construction Activity, Duration, and Typical Equipment

Construction Activity	Duration (days)(A)	Typical Equipment Used(B)
Demolition	20	Concrete/Industrial Saw, Dozer, Excavator
Site Preparation	40	Dozer, Backhoe
Grading	40	Excavator, Grader, Dozer, Backhoe
Building Construction	390	Crane, Forklift, Generator, Backhoe, Welder
Paving	40	Cement Mixer, Paver, Roller. Backhoe
Architectural Coating	34	Air Compressor

Source: MIG, 2018 (See Appendix A).
(A) Days refer to total active work days in the construction phase, not calendar days.
(B) The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each work day.

The proposed project's maximum daily unmitigated construction emissions are shown in Table 4.3-4. The construction emissions estimates incorporate measures to control and reduce fugitive dust as required by SCAQMD Rule 403 (also shown as standard condition SC AIR-1); see Appendix A, Section 2.3.3, as well as SCAQMD Rule 1113 (also shown as standard condition SC AIR-2). Please refer to Appendix A for CalEEMod output files and detailed construction emissions assumptions.

Table 4.3-4
Unmitigated Construction Emissions Estimates

Season	Maximum Daily Emissions (lbs./day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer 2020	4.49	96.08	31.23	0.23	7.43	4.27
Winter 2020	4.54	97.00	32.08	0.22	7.43	4.27
Summer 2021	3.39	24.79	29.80	0.08	4.90	1.98
Winter 2021	3.53	24.86	28.87	0.08	4.90	1.98
Summer 2022	45.90	9.57	12.89	0.02	0.78	0.51
Winter 2022	45.93	9.58	12.82	0.02	0.78	0.51
SCAQMD CEQA Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: MIG, 2018 (see Appendix A) and SCAQMD 2015b.

As shown in Table 4.3-4, the proposed project's maximum daily unmitigated construction emissions would be below the SCAQMD's regional pollutant thresholds for all pollutants. Therefore, the construction of the proposed project would not generate construction-related emissions that exceed SCAQMD CEQA thresholds.

Monrovia's General Plan does not establish specific goals, policies, or standards related to air quality; however, the General Plan Land Use and Circulation Elements EIR include mitigation measures AIR-A through AIR-C related to air quality. The City would require the applicant to implement MM AIR-1, which imposes idling restrictions consistent with General Plan EIR Mitigation Measure AIR-C. With implementation of standard conditions SC AIR-1 and SC-AIR-2 and mitigation measure MM AIR-1, potential construction impacts are mitigated to less than significant.

Standard Conditions

SC AIR-1: Comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, by incorporating best available control measures during construction.
Requirements and Timing: Standard condition shall be printed on construction drawings and included as a requirement in the construction contract. **Monitoring:** City staff shall conduct site inspections during construction to ensure that the standard condition is adhered to.

SC AIR-2: Comply with South Coast Air Quality Rule 1113 to reduce VOC emissions from architectural coating applications. Prior to the issuance of a building permit for the Project, the Applicant shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines. The Applicant shall include in any construction contracts and/or subcontracts a requirement that Project contractors adhere to the requirements of the CRP. The CRP shall include a requirement that all interior and exterior residential and non-residential architectural coatings used in Project construction meet the SCAQMD "super

compliant" coating VOC content standard of less than 10 grams of VOC per liter of coating. The CRP shall also specify the use of high-volume, low pressure spray guns during coating applications to reduce coating waste.
Requirements and Timing: Applicant shall receive Planning Division approval of a Coating Restriction Plan (CRP) prior to receipt of building permits. **Monitoring:** City Planning staff shall conduct site inspections to ensure that the CRP is followed during construction.

Mitigation Measures

MM AIR-1: Idling Restrictions. 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 five consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

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

Requirements and Timing: Mitigation measure shall be printed on construction drawings and included as a requirement in the construction contract. **Monitoring:** City staff shall conduct site inspections during construction to ensure that the mitigation measure is adhered to.

Operational Emissions

Existing Emissions
The approximately 1.83-acre project site consists of a light industrial building, a commercial building, and associated parking. Both buildings are currently in use. Thus, current sources of emissions at the proposed project site contribute to existing regional and local air quality conditions. The light industrial use encompasses approximately 20,520 square feet of floor area. The commercial use encompasses approximately 18,940 square feet of floor area. The parking lot covers the balance of the site—approximately 60,000 square feet—and includes approximately 99 passenger vehicle parking spaces. These existing land uses generate emissions from the following sources:
:

- **Small "area" sources.** Existing land uses in the project site generate emissions from small area sources including landscaping equipment and the use of consumer products such as paints, cleaners, and fertilizers that result in the evaporation of chemicals into the atmosphere during product use.
- **Energy use and consumption**. Existing land uses in the project site generate emissions from the combustion of natural gas in water and space heating equipment, as well as industrial processes.
- **Mobile sources.** Existing land uses in the project site generate emissions from vehicles travelling to and from the plan area.

The project site's existing emissions were estimated using CalEEMod, V. 2016.3.2. The existing emissions were estimated using default data assumptions provided by CalEEMod, with the following project-specific modifications:

- The default acreage and square footage for each of the project site's land use types were adjusted to reflect the actual project site as currently developed.
- The default trip generation rates for the existing land use types were replaced with trip generation rates contained in the Transportation Impact Study (TIS) prepared for the proposed project (Linscott, Law, and Greenspan 2018). According to the TIS, the existing land uses generate 2.91 trips per thousand square feet of building space in total.
- The default electrical and natural gas energy efficiency intensity values for residential and non-residential land uses were adjusted upwards to reflect the older nature of the existing buildings and structures in the area.
- The default outdoor water use for non-residential land uses was set to zero to reflect the paved nature of the project site.

Table 4.3-5
Existing Project Site Criteria Pollutant Emissions

Emissions Source	Maximum Daily Pollutant Emissions (Pounds Per Day) (A)							
	ROG	NO_x	CO	SO_2	PM_{10}		$PM_{2.5}$	
					Dust	Exhaust	Dust	Exhaust
Area	0.91	<0.00	0.01	0.00	--	<0.00	--	<0.00
Energy	0.02	0.21	0.18	<0.00	--	0.02	--	0.02
Mobile	0.24	1.21	3.46	0.01	0.94	0.01	0.25	0.01
Combined Total(B)	1.17	1.42	3.65	0.01	0.93	0.03	0.25	0.03

Source: MIG 2018, see Appendix A.

(A) Emissions estimated using CalEEMod, V 2016.3.2. Estimates are based on default model assumptions unless otherwise noted. Maximum daily ROG, CO, and SO_2 emissions occur during the summer. Maximum daily NO_X, PM_{10}, and $PM_{2.5}$ emissions occur during the winter.

(B) Totals may not equal due to rounding.

(C) "<0.00" does not indicate the emissions are less than or equal to 0; rather, it indicates the emission is smaller than 0.01 but larger than 0.000.

Once operational, the proposed project would generate emissions of regulated air pollutants from area, energy, and mobile sources. The net change in emissions of regulated air pollutants that would occur with implementation was modeled using CalEEMod, Version 2016.3.2. The operational emissions were modeled based on the project's first full year of operation (2023) using default data assumptions provided by CalEEMod, with the following project-specific modifications:

- The default trip generation rates for the existing land use types were replaced with trip generation rates contained in the TIS prepared for the project (Linscott, Law, and Greenspan 2018). According to the TIS, each residential dwelling unit would generate 4.07 daily weekday trips and the commercial space would generate 24.1 trips per thousand square feet. These trip rates reflect a 15% (commercial) and 25% reduction below the standard trip rate for these uses to account for the project's proximity to the Monrovia Gold Line station.

- The default electrical and natural gas energy efficiency intensity values for residential and non-residential land uses were adjusted downwards to reflect the California Energy Commissions adoption of the 2019 energy efficiency standards. The 2019 energy efficiency standards would take effect on January 1, 2020, and would reduce energy use from residential and non-residential development through the required installation of solar photovoltaic systems, electric demand response compliance options such as battery storage systems, stronger building envelope insulation for attics, walls, and windows, and use of light-emitting diode lighting systems.

- Woodstoves and hearths were excluded pursuant to General Plan requirements and SCAQMD Rule 445.

One 50-horsepower diesel-fueled back-up generator and one 50-horsepower, diesel-fueled fire pump was presumed to be present onsite and operate a total of 18 hours per year.

The proposed project's maximum daily unmitigated operational emissions are shown in Table 4.3-6. The emissions presented are for the proposed project's first full year of operation, which is presumed to be 2023.

Table 4.3-6
Unmitigated Operational Emissions Estimates (Year 2023)

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) (A)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
127 West Pomona Avenue Mixed Use Project Emissions(A)						
Area	5.47	0.30	25.63	<0.00	0.14	0.14
Energy	0.12	1.05	0.45	0.01	0.09	0.09
Mobile	2.59	4.81	35.18	0.12	12.22	3.31
Total Project Emissions(B)	*8.18*	*6.16*	*61.26*	*0.13*	*12.44*	*3.54*
Existing 127 West Pomona Mixed Use Project Site Emissions						
Total Existing Emissions(C)	*1.17*	*1.42*	*3.65*	*0.01*	*0.03*	*0.03*
Net Change in Emissions Levels						
Total Net Change	+7.01	+4.74	+57.61	+0.12	+12.41	+3.51
SCAQMD CEQA Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: MIG, 2018 (See Appendix A)
(A) Emissions presented are worst-case emissions and may reflect summer or winter emissions levels. Maximum daily ROG, CO, SO_X emissions occur during the summer. Maximum daily NO_X emissions occur during the winter. In general, due to rounding, there is no difference between summer and winter PM_{10} and $PM_{2.5}$ emissions levels for the purposes of this table.
(B) Totals may not equal due to rounding. Stationary sources would add less than 0.000 pounds per day of emissions to the project's area, energy, and mobile source total.
(C) See Appendix A, Table 2-5.
(D) Totals may not equal due to rounding.

As shown in Table 4.3-6, the proposed project's maximum daily unmitigated operational emissions would be below the SCAQMD's regional pollutant thresholds for all pollutants. Therefore, the proposed project would not generate operations-related emissions that exceed SCAQMD CEQA thresholds.

c) **Less than Significant Impact.** Some populations are more susceptible to the effects of air pollution than the population at large; these populations are defined as sensitive air quality receptors. Sensitive receptors include children, the elderly, the sick, and the athletic. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The sensitive air quality receptors adjacent or in close proximity to the perimeter of the project include residential properties located approximately 115 feet west of the project site (on West Evergreen Avenue). The nearest school is Santa Fe Middle School, located approximately 0.18 miles to the southwest.

In addition to criteria air pollutants such as NO_X (an ozone precursor), CO, PM_{10}, and$PM_{2.5}$, the U.S. EPA and CARB have classified certain pollutants as hazardous air pollutants (HAPs) or toxic air contaminants (TACs), respectively. These pollutants can cause severe health effects at very low concentrations, and many are suspected or confirmed carcinogens. The U.S. EPA has identified 187 HAPs, including such substances as arsenic and chlorine; CARB considers all U.S. EPA designated

HAPS, as well as diesel particulate matter (DPM) emissions from diesel-fueled engines and other substances, to be a TAC. The proposed project would generate both short-term construction emissions and long-term operational emissions that could impact sensitive residential receptors located near the project; however, as described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed SCAQMD-recommended localized significance thresholds or result in other substantial pollutant concentrations.

Localized Significance Thresholds Analysis

Construction Emissions

In addition to establishing thresholds of significance for emissions of criteria air pollutants on a regional level, the SCAQMD has also developed Local Significance Thresholds (LSTs) that represent the maximum emissions from a project that are expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, which would result in significant adverse localized air quality impacts.[10] The LST methodology takes into account a number of factors, including: (1) existing ambient air quality in each Source Receptor Area (SRA); (2) how many acres the project would disturb in a day; and (3) how far project construction and operational activities would take place from the nearest sensitive receptor. Unlike the SCAQMD's regional emission significance thresholds presented in Table 4.3-4, LSTs have only been developed for NOx, CO, PM_{10} and $PM_{2.5}$.

The proposed project's maximum daily construction emissions are compared against the SCAQMD's-recommended LSTs thresholds in Table 4.3-7. Consistent with the SCAQMD's LST methodology, the emissions included in the construction LST analysis are onsite emissions only, and the LST thresholds against which these onsite emissions are compared are based on the project size, in acres, as determined using the specific equipment list generated by the CalEEMod project file and the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*.[11] The LSTs are for SRA 9 (East San Gabriel Valley) in which the proposed project is located. The LSTs presented in Table 4.3-7 are based on the use of three rubber-tired dozers during the site preparation phase[12] and a receptor distance of approximately 100 feet (approximately 30.5 meters). Since the SCAQMD LSTs are presented for varying receptor distances (i.e., 25 meters, 50 meters, 100 meters, etc.) and one-, two-, and five-acre sizes, the LSTs presented in Table 4.3-7 reflect interpolated values based on a maximum of 1.5 acres (not the entire site would be affected on any one day) disturbed per eight-hour workday at a receptor distance of 35 meters.

[10] The SCAQMD has established the following thresholds of significance for projects that generate TAC emissions: Maximum Incremental Cancer Risk ≥ 10 in 1 million; Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million); Chronic & Acute Hazard Index ≥ 1.0 (project increment). However, they have not developed thresholds for sensitive receptor projects located near existing TAC emissions sources.

[11] SCAQMD 2016. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Available online at:

[12] Per the SCAQMD "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds", each rubber-tired dozer is presumed to disturb a maximum of 0.5 acres per 8-hr work day; three (3) rubber-tired dozers would result in a maximum of 1.5 acres graded per eight-hour workday (SCAQMD 2016c).

Table 4.3-7
Construction Emissions Localized Significance Thresholds Analysis

Construction Phase[B]	Maximum Onsite Pollutant Emissions (lbs./day) [A]			
	NOx	CO	PM_{10}	$PM_{2.5}$
Demolition	33.2	21.8	1.9	1.6
Site Preparation	42.4	21.5	6.2	4.2
Grading	26.4	16.1	2.7	1.9
Building Construction 2020	19.2	16.8	1.1	1.1
Building Construction 2021	17.4	16.6	1.0	0.9
Paving 2021	10.8	12.3	0.6	0.5
Paving 2022	9.5	12.2	0.5	0.5
Architectural Coating	1.4	1.8	0.1	0.1
SCAQMD LST Threshold[C]	**112.8**	**862.3**	**8.6**	**4.4**
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: MIG, 2018 (See Appendix A) and SCAQMD 2008, 2016c.

(A) Emissions estimated using CalEEMod, V 2016.3.2. Estimates are based on default model assumptions unless otherwise noted in this report. Estimates are based on the mitigated construction onsite emissions estimates reported by CalEEMod.

(B) Emissions presented are worst-case emissions and may reflect summer or winter emissions levels. In general, due to rounding, there is no difference between summer and winter emissions levels for the purposes of this table.

(C) LST threshold presented is an interpolated value based on 1.5-acre project size and 35-meter receptor distance.

The emissions presented in Table 4.3-7 incorporate certain best available control measures the proposed project would implement pursuant to SCAQMD Rule 403, Fugitive Dust (also shown as standard condition SC AIR-1). Specifically, the CalEEMod project file applies a 74% total reduction in PM10 and PM2.5 fugitive dust emissions through site watering (four times daily, Countess Environmental 2006). These estimated reductions are consistent with the reductions realized by the numerous best available control measures contained in SCAQMD Rule 403.

Operational Emissions

The proposed project's maximum daily operational emissions are compared against the SCAQMD's-recommended LSTs in Table 4.3-8. The LSTs are for SRA 9 (East San Gabriel Valley) in which the proposed project is located. The operational emissions from onsite area, energy, and mobile emissions sources were estimated against the SCAQMD's thresholds for a 1.8-acre project size, at a distance of approximately 100 feet (30.5 meters).

Table 4.3-8
Operational Emissions Localized Significance Thresholds Analysis

Operational Emission Source[B]	Maximum Onsite Pollutant Emissions (lbs./day) [A]			
	NOx	CO	PM_{10}	$PM_{2.5}$
Area[C]	0.30	25.63	0.14	0.14
Energy	1.05	0.45	0.09	0.09
Mobile[D]	0.45	3.52	1.22	0.33
Total onsite Emissions	1.8	29.6	1.45	0.56
SCAQMD LST Threshold[E]	**121**	**948**	**2.9**	**1.6**
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: MIG, 2018 (See Appendix A) and SCAQMD 2008, 2016c.

(A) Emissions estimated using CalEEMod, V 2016.3.2. Estimates are based on default model assumptions unless otherwise noted in this report.

(B) Emissions presented are worst-case emissions and may reflect summer or winter emissions levels. In general, due to rounding, there is no difference between summer and winter emissions levels for the purposes of this table.

(C) Area source emissions are from Table 5-5.

(D) Mobile source emissions are from Table 5-5. Total onsite mobile source emissions were presumed to be equal to 10% of total mobile emissions estimates.

(E) The LSTs are based on 1.8.-acre project size and 30.5-meter receptor distance.

Carbon Monoxide Hotspots

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near high-volume intersections. Several screening procedures have been developed by air districts throughout the state to assess whether a project may result in a CO impact. For example, the Bay Area Air Quality Management District (BAAQMD) developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis (BAAQMD, 2017 pg. 3-4). Additionally, the SCAQMD's 2003 AQMP and *1992 Federal Attainment Plan for Carbon Monoxide* demonstrated that CO levels were below the CAAQS at an intersection with a daily traffic volume of up to approximately 100,000 vehicles per day. According to the General Plan Circulation and Noise Elements, there are no roadways in the City that experience hourly volumes close to 44,000 vehicles or more or daily volumes of 100,000 vehicles or more. The proposed project would add a total of 1,390 vehicle trips per day to the roadway system and would not cause intersection volumes to exceed any daily (100,000) or hourly (44,000) screening vehicle volumes maintained by the SCAQMD and other regional air districts and therefore, would not result in significant CO concentrations.

Construction Fugitive Dust and DPM Emissions

Construction activities associated with the proposed project would result in demolition, site preparation, grading, and other activities that would generate fugitive dust. as shown in Tables 4.3-4 and 4.3-7, the

total PM_{10} and $PM_{2.5}$ emissions generated during construction of the proposed project would be below SCAQMD LST thresholds during demolition, site preparation, grading, and all other construction activities. The SCAQMD's LST thresholds represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state AAQS. Since t construction emissions would not exceed applicable LST thresholds, the proposed project would not expose sensitive receptors to substantial fugitive dust concentrations.

A portion of the PM_{10} and $PM_{2.5}$ emissions generated during construction of the proposed project shown in Table 4.3-4 would be DPM. DPM is a TAC that can potentially cause substantial adverse health risks at concentrations lower than the ambient air quality standards for PM_{10} and $PM_{2.5}$ set by the federal and state CAA. Equipment with diesel engines would be used during all phases of the proposed project's development, and some construction activities would occur as close as approximately 115 feet away from sensitive receptor locations (e.g., receptors across South Primrose Avenue and South Myrtle Avenue). Most construction activities on the interior of the project site would occur 250 feet or more from sensitive receptor locations.

The proposed construction activities would not expose nearby sensitive receptors to substantial levels of DPM that would pose a significant adverse health risk for several reasons. First, the proposed project includes BMPs to reduce DPM from equipment idling, which would directly reduce the potential health risks at nearby sensitive receptor locations. Second, as shown on page 2-6 of the Air Quality and Greenhouse Gas Report (Appendix A), the prevailing daytime wind direction at the nearest meteorological station maintained by the SCAQMD, in Azusa (less than five miles east of the project site), is from the west/southwest. Wind conditions at this location are considered representative of wind conditions at the project site, meaning that DPM emissions generated by construction equipment would generally be pushed to the east/northeast, away from the closest sensitive residential receptors, and pollutants would quickly disperse over distance. Finally, potential long-term adverse health risks from DPM are evaluated assuming a constant exposure to emissions over a 70-year lifetime, 24 hours a day, seven days a week, with increased risks generally associated with increased proximity to emissions sources. Since construction activities would only generate DPM emissions on an intermittent, short-term basis, DPM emissions from construction activities would be unlikely to result in adverse health effects to existing sensitive receptors that exceed the SCAQMD's significance criteria.[13]

Exacerbation of Existing I-210 Freeway Environmental Health Risks

According to the SCAQMD's MATES IV Carcinogenic Risk Map, the existing cancer risk on either side of I-210 in the vicinity of the project (south and north of I-210) is 1,456 and 1,142, respectively (i.e., there is a probability of 1,456 and 1,142 excess cases of cancer out of a population of one million) (SCAQMD 2018d). These cancer risks are orders of magnitude higher than the SCAQMD's significance threshold of 10 cases in one million for cancer risk. These estimates, however, are based upon regional modeling efforts that largely do not account for site specific emission rates and dispersion characteristics that typically result in refined and substantially lower health risk estimates.

[13] The SCAQMD has established the following thresholds of significance for projects that generate TAC emissions: Maximum Incremental Cancer Risk ≥ 10 in 1 million; Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million); Chronic & Acute Hazard Index ≥ 1.0 (project increment). However, they have not developed thresholds for sensitive receptor projects located near existing TAC emissions sources.

The CalEnviroScreen data also indicate that approximately 28 people per 10,000 people in the project area's census tract visited an emergency facility for asthma-related health issues. This rate places the project area's census tract in the 20th percentile, meaning the asthma rate in this census tract is higher than 20% of the census tracts in the State (OEHHA 2018). This factor indicates that adverse respiratory health is not prevalent in the census tract in which the proposed project area is located, and that the existing conditions in the census tract are such that sensitive receptors are in an area of lower risk for adverse respiratory health effects compared to other areas in the state.

The City of Monrovia has policies that address the evaluation of existing conditions such as cancer risks and children's respiratory health[14]. Pursuant to these policies, a Health Risk Assessment (HRA) was conducted to evaluate the potential health hazards to new residential receptors in the project area from the I-210 Freeway. In addition, an evaluation of the potential effects on children's respiratory health that may result due to the project's proximity to the I-210 Freeway is provided below. The disclosure of these evaluations is consistent with one of the primary objectives of CEQA and this document, which is to provide objective information to decision-makers and the public regarding the project as a whole.

The project area ranges from approximately 130 feet to 350 feet south of I-210, an existing local source of DPM emissions[15]. Buildout of the proposed project would result in the placement of new sensitive residential receptors within 500 feet of I-210. The proposed project would have the potential to expose existing sensitive receptors present near the project site to existing pollutant concentrations from I-210 and from construction and operation. Construction activities associated with the proposed project would have the potential to generate fugitive dust and emissions of DPM (a toxic air contaminant), which could impact sensitive air quality receptors. In addition, once operational, the proposed project would result in the placement of new sensitive residential receptors within 500 feet of I-210, an existing source of vehicle emissions located adjacent to the project site. In addition, the project is located approximately 500 feet from the Metro Gold Line light rail.

The proposed project would be exposed to DPM emissions and associated adverse health risks from vehicle traffic on the adjacent I-210. Although the potential effect of emissions associated with vehicles on I-210 on the future residential receptors associated with the proposed project is not considered an impact of the project for the purposes of CEQA (see discussion below), the project's potential to exacerbate existing I-210 DPM emissions and corresponding adverse health hazards is within the scope of CEQA and is evaluated below.

According to Caltrans traffic data, the segment of I-210 adjacent to the proposed project area carries approximately 252,000 vehicles per day. Based on CARB's EMFAC2017 model, approximately 4.0% of all vehicles in the Los Angeles (South Coast) region are diesel vehicles, meaning there are approximately 9,977 diesel vehicles that pass by the project area on a daily basis, emit DPM, and contribute to potential existing adverse health risks (see Table 4.3-10 below.) The proposed project would not significantly exacerbate I-210 emissions for several reasons. First, according to the Traffic

[14] The City's 2008 Land Use and Circulation Element EIR included Mitigation Measures AIR-F and AIR-G, which require applications to complete a health risk assessment to determine cancer risk to sensitive receptors for all residential projects located within 500 feet of I-210 (AIR-F), as well as the potential impacts to children's respiratory health for all residential projects located within 500 feet of the I-210 (AIR-G) (City of Monrovia 2008).

[15] Gasoline and diesel-fueled vehicles travelling on the I-210 Freeway would emit other TACs besides DPM; however, these other TACs would be emitted in much lower quantities than DPM. In addition, the SCAQMD's MATES IV study continues to identify DPM as the primary contributor to mobile source risks estimates. Accordingly, this EIR focuses on the risk from DPM emitted by vehicles travelling on the I-210 Freeway as an overall indicator of potential adverse health risks from mobile sources operating near the site.

Impact Analysis prepared for the project, the proposed project would generate 1,390 total daily vehicle trips, of which approximately 55 (4.0%) would be diesel trips (based on the regional percentage of diesel vehicles in the Los Angeles sub region). Even if all project trips were added to I-210 (which would not be the case), the project would increase diesel vehicle trips on I-210 by less than 0.6% on a daily basis. Furthermore, as shown in Table 4.3-10 below, the predominant vehicle types that contribute to diesel emission on I-210 are trucks and buses. Automobiles and light duty trucks that are most likely to be generated by the project represent less than 3% of the total daily DPM emissions (and associated risk) generated by vehicle traffic on I-210 adjacent to the project area. This means that the proposed project could, at worst case, change DPM emissions adjacent to the project area by no more than approximately 2%. This change is not considered a significant exacerbation of the existing conditions and, therefore, is a less than significant impact.

I-210 Emissions and Associated Health Risks

Pursuant to the California Supreme Court's decision in *CBIA v. BAAQMD* the following analysis evaluates whether the proposed project would exacerbate the existing health risks associated with I-210 vehicle emissions. The operational HRA (Appendix J) was conducted consistent with the guidance and recommendations contained in the SCAQMD's California Environmental Quality Act (CEQA) *Air Quality Handbook*, as amended and supplemented (SCAQMD 2017a), SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions* (SCAQMD 2003b), and the California Office of Environmental Health Hazard Assessment's (OEHHA) *Air Toxics Hot Spots Program Guidance Manual* (OEHHA 2015).

The US EPA's AERMOD dispersion model (Version 18081) was used to predict DPM concentrations at the project boundary. The AERMOD dispersion model is a U.S. EPA-approved and SCAQMD-recommended model for simulating the dispersion of pollutant emissions and estimating ground level concentrations of pollutants at specified receptor locations. AERMOD requires the user to input information on the source(s) of pollutants being modeled, the receptors where pollutant concentrations are modeled, and the meteorology, terrain, and other factors that affect the potential dispersion of pollutants. These variables are summarized below and shown in detail in Appendices A and J to this Initial Study.

Modeled I-210 Freeway Sources and Emissions Rates
Emissions from I-210 were modeled as a polygon-area source, as shown in Table 4.3-9. The area source representing the freeway was extended 1,000 feet to the west and east of the project area boundary to capture emissions emanating from I-210 both adjacent and in close proximity to the project area. The total length of the freeway modeled was approximately 2,376 feet, or 0.45 miles.

Table 4.3-9
Modeled I-210 Freeway Emissions Source Location

Source ID	Description	UTM Coordinates (Zone 11N) (A)		Size (m^2)
		Easting	Northing	
PAREA1	I-210 Freeway Travel Lanes	407248.34	3777609.43	30,183.2

Source: MIG 2019 (see Appendix A)
Coordinates are for the southwest corner of the source.

Consistent with SCAQMD recommendations, PM_{10} exhaust from diesel vehicles travelling along I-210 was evaluated in the HRA. The emission rate for the segment I-210 modeled in the operational HRA was derived from diesel vehicle emission factors and vehicle population data contained in CARB's EMFAC model and annual average daily traffic volume data available from Caltrans. Using EMFAC data (for the Los Angeles South Coast Sub-Area), an average diesel emission factor, in terms of grams

per mile, was developed for each vehicle class, based on a speed of 55 miles per hour (mph) for school buses and 65 MPH (for all other vehicle types). Then the population percentage for each vehicle class was multiplied by the annual average daily trips (AADT) for the segment of I-210 adjacent to the project area, between Huntington Drive and South Myrtle Avenue (252,000 vehicles), to determine the total amount of diesel vehicles traveling adjacent to the project area. This diesel vehicle estimate was then multiplied by the total segment length (0.45 miles) to determine the total miles travelled by each vehicle class. The total miles travelled were then multiplied by the average emission factor to determine total diesel vehicle emissions emitted from the modeled portion of I-210. Table 4.3-10 summarizes the average emission factors, vehicle class population percentage, vehicle miles traveled, and total diesel emissions occurring within the modeled source.

Table 4.3-10
PM_{10} Emission Factors

Vehicle Class	2023 - 2050 Average PM10 Emission Factor (Grams/Mile) (A)	2023 Diesel Vehicle Population(B)	Vehicle Population Percentage(B)	I-210 ADT	Class Vehicles on I-210(C)	Trip Length (miles)	Total Daily Class Miles(D)	Total Daily PM_{10} (Grams)(E)	Total Daily PM_{10} (Grams/Sec) (F)
LDA	0.001611306	36,741	0.49%	252,000	1,224	0.45	612	0.9897	1.141E-05
LDT1	0.028116599	252	0.00%	252,000	8	0.45	4	0.118	1.36559E-06
LDT2	0.003345548	9,765	0.13%	252,000	325	0.45	163	0.544	6.29648E-06
LHDT1	0.006014986	68,776	0.91%	252,000	2,291	0.45	1,145	6.89	7.97314E-05
LHDT2	0.010734683	27,874	0.37%	252,000	928	0.45	464	4.98	5.76695E-05
HHDT	0.033787693	57,613	0.76%	252,000	1,919	0.45	959	32.4	0.000375178
MDV	0.001345391	21,298	0.28%	252,000	709	0.45	355	0.477	5.52262E-06
MH	0.038410995	6,167	0.08%	252,000	205	0.45	103	3.94	4.56549E-05
MHDT	0.015244088	64,520	0.85%	252,000	2,149	0.45	1,074	16.4	0.000189563
OBUS	0.023503175	3,071	0.04%	252,000	102	0.45	51	1.20	1.39112E-05
SBUS	0.018215134	3,497	0.05%	252,000	116	0.45	58	1.060	1.22768E-05
UBUS	0.003787529	10	0.00%	252,000	0	0.45	0	0.001	7.29985E-09
ALL DSL	0.013830742	299,584	3.96%	252,000	9,977	0.45	4,989	69.0	0.000798587

Source: EMFAC2017 and Caltrans 2017.

(A) Emission factors represent the average emission factor for the vehicle class over the 2023 to 2050 time period. Emission factors are reported for a speed of 55 miles per hour for school buses (SBUS) and 65 miles per hour for all other vehicle classes

(B) Population and population percentage reflects the proportion of each vehicle class out of the total amount of vehicles in the Los Angeles (South Coast) sub-area.

(C) Class vehicle amounts are estimated by multiplying the vehicle population percentage times 252,000 (the AADT on I-210).

(D) Total daily vehicle miles travelled is estimated by multiplying class vehicles times trip length (i.e., distance traveled in the modeled source).

(E) Total Daily emissions is estimated by multiplying the vehicle miles travelled by the average emission factor.

(F) Grams per second is derived based on 86,400 seconds per day.

The release height for the modeled source was set to 3.28 meters to approximate an average of height of all vehicle exhaust sources.

Meteorological Data, Terrain, and Modeled Receptors
In addition to information on the sources of pollutant's being modeled, AERMOD requires the user to input information on the receptors where pollutant concentrations are modeled, and the meteorology, terrain, and other factors that affect the potential dispersion of pollutants. These variables are described below and in detail in Appendix A (Air Quality and Greenhouse Gases).

Meteorological Data Inputs: AERMOD requires surface meteorological data, upper air meteorological data, and surface parameter data such as albedo (reflectivity) and surface roughness. For the proposed project, pre-processed surface data from the SCAQMD was obtained for the Azusa meteorological station, the closest meteorological station to the proposed project site. Five complete years of meteorological data from January 2012 to December 2016 were utilized; the SCAQMD data set incorporates the U.S. EPA's option for adjusted surface friction velocity factors (μ*) under low and stable wind conditions. Emissions were presumed to be generated 24-hours per day. The wind rose for the Azusa meteorological station data set is shown in Figure 9.

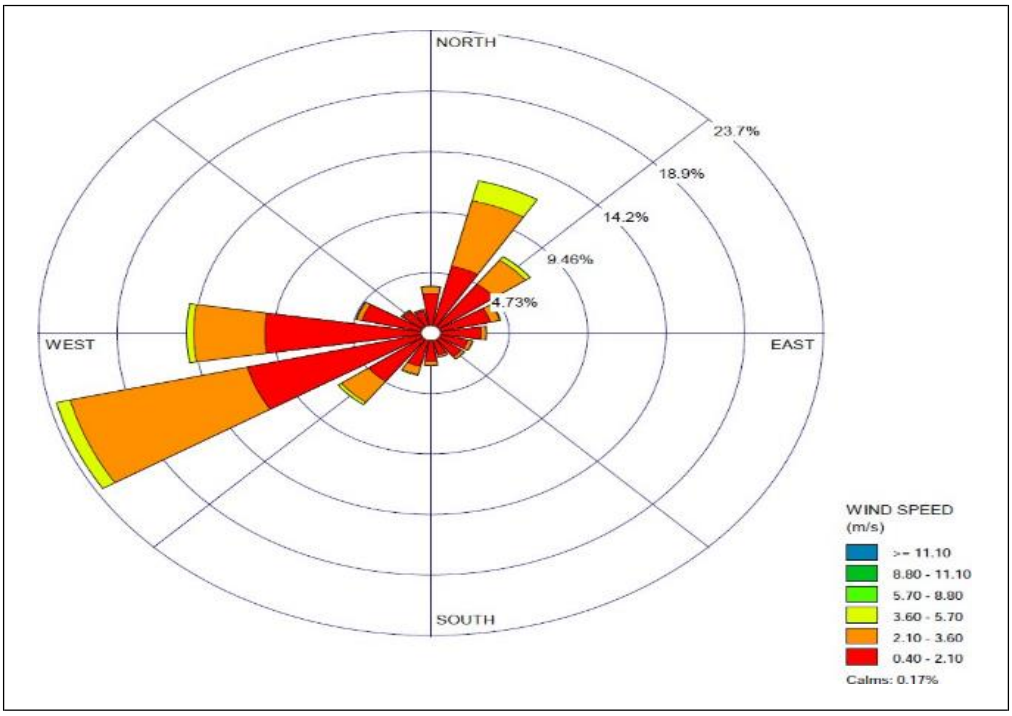

Figure 9: Wind Rose for Azusa Meteorological Station

- *Terrain Inputs:* Terrain was incorporated by using AERMAP (an AERMOD pre-processer) to import the elevation of the project site and surrounding area using data from the National Elevation Dataset with a resolution of 1/3 arcsecond.

Modeled Receptors: Emissions were modeled in a multiple-tier fence line grid. The first tier consisted of 5-meter spacing from the fence line for 25 meters; the second tier consisted of 100 meters spacing for an additional distance of 475 meters. Primary and intermediate receptors were also spaced every 5 meters along the fence line. The receptor grids were then converted to discrete Cartesian receptors

(2,771 in total). Receptors were modeled at ground level, i.e., at a height of 0.0 meters above the ground.

Estimated Cancer Risk

Cancer risk is the calculated, pollutant-specific estimated probability of developing cancer based upon the dose and exposure to the TAC. Cancer risk is determined by calculating the combinatory effects of the cancer potency factor (CPF) when inhaling the toxic, the daily inhalation dose, the age group the receptor is cohort to, the duration of exposure over a lifetime (30 years), and other factors such as age sensitivity and the amount of time spent at the location of exposure. The potential cancer risk associated with emissions from I-210 was assessed for the maximally exposed individual resident (MEIR) over a 30-year exposure duration (that characterizes the maximum residency tendency in California). Residential risk calculations account for presumed sensitivity to carcinogens and differences in intake rates for the third trimester to birth, birth to two-years, two-years to nine-years, two-years to 16-years, and 16-year to 30-years age bins. Concentrations were modeled using AERMOD and then input into CARB's Hot Spots and Reporting Program (HARP) Health Risk Assessment Standalone Tool (RAST) to calculate cancer risk based on the methods and recommendations found in the OEHHA HRA Guidelines. The RAST intake rate percentile was set to the 95th percentile and the FAH factor was applied to age bins less than 16 years. The resulting annual average DPM concentration and corresponding excess cancer risk at the PMI and MEIR are summarized in Table 4.3-11. The PMI is located offsite, in the I-210 right-of-way and would not be occupied by residential receptors; cancer risks at this location, therefore, were not estimated. The MEIR is located at the northeast corner of the proposed project site. The incremental increase in cancer risk at this location is 35.1 in one million. Modeled sources, receptor locations, DPM concentrations, and the locations of the PMI and MEIR are depicted on Figure 10.

Table 4.3-11
PM_{10} Emission Factors

Receptor	UTM Location		Annual Average DPM Concentration ($\mu g/m^3$)	Excess Cancer Risk (per million population)
	Easting	Northing		
PMI(A)	407443.51	3777627.07	0.14948	--
MEIR (Outdoors, without HVAC Filters)	407649.59	3777572.75	0.0515	35.1
MEIR (Indoors, with MERV-13 Filters)	407649.59	3777572.75	0.0515	35.1

Source: MIG 2019 (see Appendix B and C)

(A) The PMI is located in the I-210 Freeway right-of-way and is not an occupied receptor location.

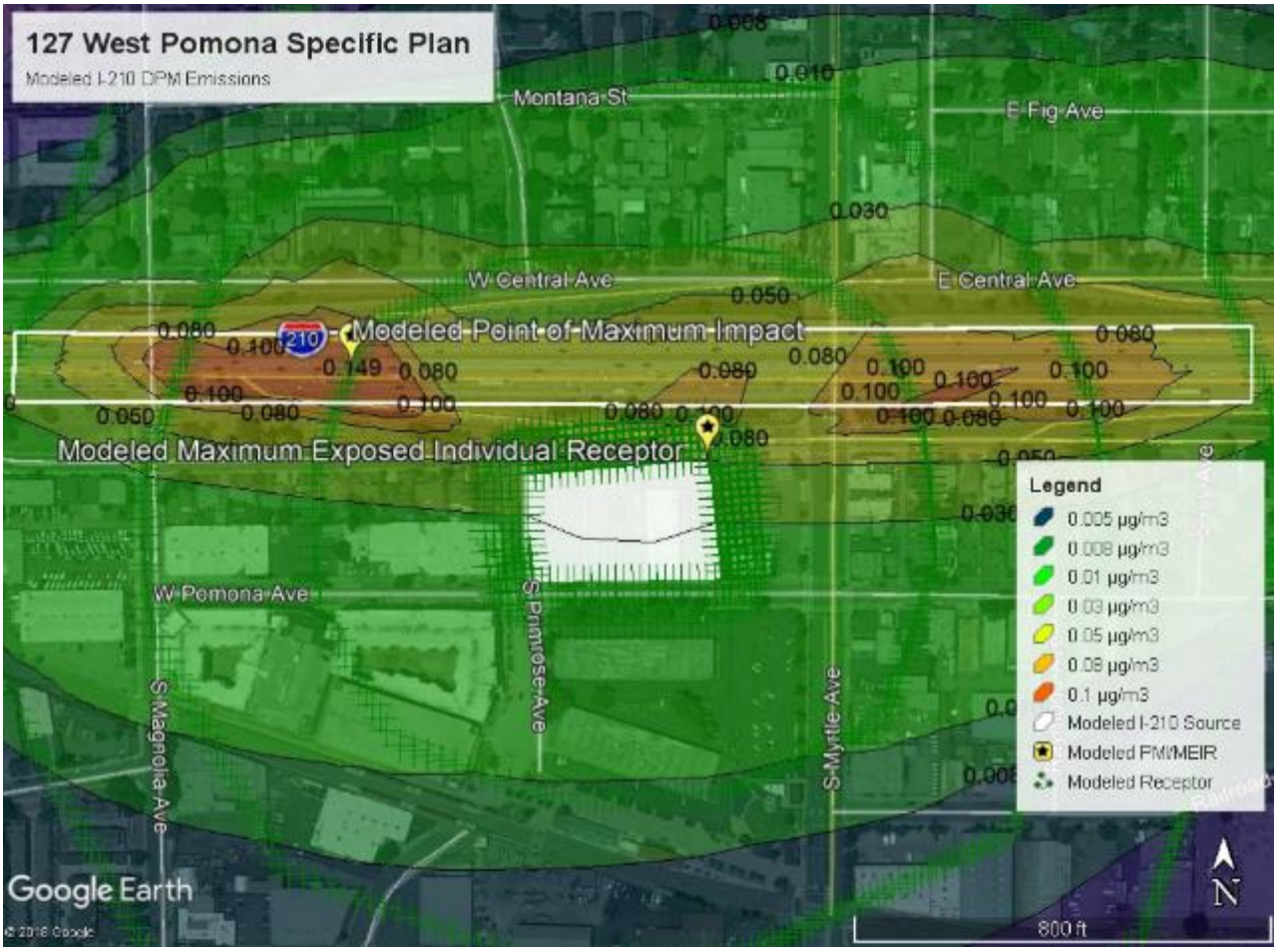

Figure 10: Modeled Source, Receptor, and DPM Contours

As shown in Table 4.3-10 and Figure 10, the results of the modeling indicate that, in general, DPM concentrations are higher on the northern side of the project area. This is due to the proximity of the northern project boundary to I-210. In general, the estimated cancer risks along the northern project area boundary are in the range of approximately 35 excess cancers per million population, while risks along the southern project area boundary range from 13.9 to 14.5 (see Appendix J for more details). These uncontrolled, site-specific cancer risks are much lower than the SCAQMD's MATES IV results, but still above the SCAQMD recommended cancer risk threshold of 10 cases of cancer per million population (by a factor of approximately 3.5 at the worst-case MEIR location).

These risk estimates do not take into account any reductions in PM that would be achieved by mechanically supplied air systems. Specifically, the 2019 amendments made to the California Building Standards Code, set to go into effect on January 1, 2020 (before project construction is complete), would require high-rise multifamily dwellings within 500 feet of busy roadways (more than 100,000 ADT) to use HVAC systems and filters with a Minimum Efficiency Rating Value (MERV) of 13. So-called MERV-13 filters can remove up to 90% of particles less than 10 microns in size, which would result in a corresponding reduction in exposure to PM_{10} and associated adverse health risks by 90%. A 90%

reduction in modeled PM concentrations (i.e., indoor air quality levels) would reduce risks to 3.51 excess cancer cases per million population, which is the SCAQMD threshold. The California Building Standards code would require these HVAC systems to be appropriately designed and sized for individual dwelling units. The City will require a condition be applied that the project operator/manager of the apartments to replace the filters as recommended by the manufacturer to provide the long-term air quality benefit and risk reduction these enhanced filtration systems are designed to achieve.

In addition to filtration of ambient air, it is important to note that cancer risks estimated for portion of I-210 in close proximity to the site are conservative and are likely to overestimate potential risks for the following reasons:

1. The lifetime exposure for a sensitive receptor was assumed to begin in the third trimester (i.e., in the womb) in the project area. It was also assumed that sensitive receptors would then continue to be exposed through the infant stage and into early childhood. Risks to adult receptors (receptors older than 16 at the time of initial exposure) would be much lower (approximately 80% lower and less than the SCAQMD carcinogenic risk threshold).
2. The HRA estimates are based on near continuous exterior exposure at property line locations. Concentrations within the interior of the property where receptors would actually be located would be lower. Consistent with CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways (CARB 2017), the proposed project design promotes air flow and pollutant dispersion in the following ways.
    a. The proposed building design includes structures of varying height and articulation, as well as spaces that encourage airflow and dispersal of pollutants (e.g., public and private recreation areas). The overall street scape on West Evergreen Avenue and West Pomona Avenue also includes buildings of varying shapes and sizes, which aids air flow and pollutant dispersion.
    b. The segment of I-210 adjacent to the project area includes a solid sound barrier. Such barriers have been found to significantly reduce near-road pollution concentrations for a variety of pollutants, by as much as 50% within approximately 165 feet of the barrier, and 30% within approximately 1,000 feet of the barrier.
3. The project is an infill, transit-oriented development that would result in an overall reduction of vehicle miles traveled by residents and workers in the City of Monrovia, thereby reducing overall traffic in the City and along the I-210 Freeway. This is one of CARB's strategies for reducing air pollution exposure near high-volume roadways (CARB 2017).

Cancer Burden

Cancer burden is the product of public cancer risk and the population exposed to the carcinogen. The population of the 127 West Pomona Avenue Specific Plan is conservatively estimated to be 570 people. Using the highest modeled residential exposure (i.e., the MEIR), the average cancer risk based on the lifetime exposure scenario (70 years) is 3.51E-05 (approximately 35 cases per million people). The product of cancer risk and the estimated population is 0.02 and is below the SCAQMD threshold of 0.5 excess cancer cases in the project population.

Non-Carcinogenic Risks

The chronic non-cancer hazard quotient is the calculated pollutant-specific indicator for risk of developing an adverse health effect on specific organ system(s) targeted by the identified TAC, in this case DPM. The potential for exposure to result in chronic non-cancer effects is evaluated by comparing

the estimated annual average air concentration to the chemical-specific, non-cancer chronic RELs. The REL is a concentration below which there is assumed to be no observable adverse health impact to a target organ system. When calculated for a single chemical, the comparison yields a ratio termed a hazard quotient. To evaluate the potential for adverse chronic non-cancer health effects from simultaneous exposure to multiple chemicals, the hazard quotients for all chemicals are summed, yielding a hazard index. The chronic REL for DPM was established by OEHHA as 5 µg/m3. For an acute hazard quotient, the one-hour maximum concentration is divided by the acute REL for the substance; however, there is no acute REL for DPM.

As shown in Table 4.3-11, the annual average DPM concentration at the MEIR is 0.0515 µg/m3, which yields a chronic hazard quotient of 0.01 This value does not exceed the SCAQMD's non-carcinogenic risk threshold of 1. Please refer to Appendix J (Health Risk Assessment Report) for non-carcinogenic risk calculations.

Children's Respiratory Health

The presence of pollutants in ambient and indoor air, as well as other factors such as humidity level, can affect respiratory health by making it harder to breath, damaging tissue, and/or modifying symptoms of pre-existing conditions. Most pollutants can affect respiratory health (see Appendix A, Section 2.1.1). PM can pass through the throat and lungs and if small enough even enter the bloodstream. CO can reduce oxygen delivery to the body's organs. NO_X can inflame the respiratory tract. In particular, air pollutants, can trigger asthmatic responses.

According to the OEHHA CalEnviroScreen 3.0 report (2017a), asthma is a disease that affects the lungs and makes it hard to breathe. Symptoms include breathlessness, wheezing, coughing, and chest tightness. While the causes of asthma are poorly understood, it is well established that exposure to traffic and outdoor air pollutants, including PM, O_3, and DPM can trigger asthma attacks. Nearly three million Californians currently have asthma and about five million have had it at some point in their lives. Children, the elderly and low-income Californians suffer disproportionately from asthma. Asthma increases an individual's sensitivity to pollutants. Children living near major roadways and traffic corridors in California have been shown to suffer disproportionate rates of asthma, and DPM has been implicated as a potential cause of new-onset asthma (CARB 2017).

As described in Section 2.1.8 of the Air Quality and Greenhouse Gas Report, CalEnviroScreen data indicates the project site's census tract is in the 38^{th} percentile for asthma, meaning the asthma rate in this census tract is higher than 38% of the census tracts in the state (OEHHA 2018). This factor indicates that adverse respiratory health in the general vicinity of the project area is somewhat less prevalent than in other parts of the state.

As described under discussion Section 4.3 Operation Emissions above, the proposed project's emissions of air pollutants would be below SCAQMD-recommended LST thresholds, which represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standards. In developing the CAAQS and NAAQS, the U.S. EPA and CARB considered scientific evidence linking exposure to air pollutants to health risks, including the potential to exacerbate asthma symptoms. Although each individual's health characteristics, environment, and pre-disposition to adverse respiratory health effects is different, compliance with the CAAQS and NAAQS, as well as health risk thresholds, is intended to protect the most sensitive individuals, including and especially, children.

It is important to note that the HRA conducted for the project predicted an annual average DPM concentration at the MEIR of 0.0515 µg/m^3. This modeled, modeled annual average concentration is

substantially less than the 5 µg/m^3 DPM chronic REL established by the U.S. EPA as "an estimate of a continuous inhalation exposure to the human population, including sensitive subgroups, with uncertainty spanning perhaps an order of magnitude, that is likely to be without appreciable risks of deleterious non-cancer effects during a lifetime. The [inhalation reference concentration] methodology assumes that there is an exposure threshold below which effects would not occur (U.S. EPA 2002, Page 9-18)." The maximum annual average concentration that project receptors would be exposed to would be less than 1% of the annual average concentration established to be protective of non-carcinogenic risks to humans, including children. Acute (1-hour) concentrations of pollutants can be 3 to 10 times higher than annual average concentrations; however, even at a factor of 10, potential DPM concentrations would be substantially less than the chronic REL established for DPM (i.e., substantially less than the concentration the U.S. EPA has set as the level that is likely without appreciable of non-carcinogenic effects).

In addition, the project design includes features that would promote air flow through the site and the dispersal of pollutants away from the new residential area. Furthermore, as required by California Green Building Standards Code, developers shall install, and owners maintain the installation of mechanically supplied air systems capable of filtering approximately 70% to 90% of fine particles from the ambient air. In addition, it is reasonable to assume that installation of HVAC systems with MERV-13 filters in the project area would reduce potential cancer risks resulting from DPM to levels below SCAQMD significance thresholds, although the exact level of reduction that would be realized from these filters cannot be known with certainty. For full effectiveness, the HVAC system must be in operation at all times while residents are inside their unit and must be properly maintained. As noted above, the City would condition the proposed project to require the project operator/manager of the apartments to replace the filters as recommended by the manufacturer.

Although localized concentrations of DPM and other air pollutants may, depending on individual susceptibility and other factors outside the scope of this EIR (e.g., humidity, individual activities such as cooking that lead to indoor air pollution, etc.) may trigger asthmatic or other adverse respiratory system responses, the proposed project is not anticipated to substantially exacerbate existing risks from the I-210 Freeway and has incorporated site design features to reduce potential effects on children's respiratory health that may result from the project's proximity to the I-210 Freeway.

Impact Conclusions

As discussed above, the proposed project would not expose sensitive receptors to substantial pollutant concentrations of CO or significantly exacerbate I-210 freeway DPM emissions. Additionally, for information purposes only, an HRA was conducted to evaluate the potential health hazards to new residential receptors in the project area from I-210. The HRA evaluation concludes the carcinogenic and non-carcinogenic risks related to the proposed project would not be likely to exceed SCAQMD carcinogenic risk thresholds with the use of high efficiency air filters in HVAC systems, which are prescribed for installation in new residential buildings by the California Building Code (Title 24, Part 6, Section 1050.0(m)(12)(c)). Furthermore, the proposed project is not anticipated to substantially exacerbate effects related to children's respiratory health. Therefore, impact would be less than significant.

Less than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed project would result in the construction of a new mixed-use development that could generate odors related to vehicle parking and refuse collection (e.g., oils, lubricants, fuel vapors, short-term waste odors). These activities would not generate sustained odors that would affect substantial numbers of

people or the sensitive residential receptors located 115 feet west of the project site. Therefore, less than significant impacts would occur.

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[19] A high-rise building is defined by the California Building Code as any building used for human occupancy greater than 55 feet above the lowest level of Fire Department vehicle access. For the purposes of compliance with prescriptive indoor air quality requirements, the building energy efficiency standards consider a high-rise residential building to be any building with four or more habitable stories

4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☑
c) Have a substantial adverse effect on state or federally protected wetlands (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?	□	□	□	☑

Impacts to biological resources were evaluated in the *Biological Resources Report* (see Appendix B for detail).

a) **Less than Significant Impact.** The project site is developed with light industrial uses and surface parking areas. Native vegetation does not occur onsite. Vegetation is limited to ornamental landscaping, including trees planted along sidewalks and roadways. The project site is not identified as critical habitat for any threatened and endangered species as designated by the United States Fish and Wildlife Service (USFWS)[16] The pallid bat (*Anatrophus pallidus*) is the only special status species known to occur within one mile of the project site. This species is not expected to occur within the project site because there is no suitable habitat available; also, the last occurrence was documented in 1931. Considering that the project site and surrounding areas contain no native habitat and are completely urbanized, the potential for onsite occurrence of other species is designated under the federal Endangered Species Act or as a California Species of Special Concern is extremely unlikely. Therefore, the proposed project would have a less than significant impact on any species identified as a candidate sensitive status species or species of special concern.

b) **No Impact.** The project site is a developed site, as are all surrounding properties. The project site has limited ornamental vegetation. No riparian habitat occurs onsite. Therefore, no impact on riparian habitat or other sensitive habitat would occur.

c) **No Impact.** In accordance with the federal National Wetlands Inventory (NWI) and the California Wetlands Inventory, the project site does not contain any wetlands, and the proposed project would not be located in an area that may impact wetlands within the vicinity. A desktop survey of the project site conducted by MIG identified a riverine water resources feature 0.76 miles west of the project site. No water resource features exist onsite. In addition, the General Plan Land Use and Circulation Elements EIR Biological Technical Study did not identify any water resources. Therefore, no impact would occur.

d) **Less Than Significant Impact with Mitigation Incorporated.** The project site is developed with light industrial uses and is surrounded on the north, east, south, and west by streets and buildings. According to the Monrovia General Plan, the project site is not located in any known mapped wildlife corridor. Vegetation is limited to ornamental landscaping. The project site does not provide for the movement of any native resident or migratory fish or wildlife. However, nesting birds may use ornamental trees for nesting. Nesting birds protected under the Migratory Bird treaty Act (MBTA) and California Fish and Game Code have the potential to be impacted by tree removal and other construction work if these activities were to take place during the nesting season of February 1

[16]United States Fish and Wildlife Service (USFWS). Information for Planning and Consultation (IPaC) List for the 127 Pomona Specific Plan project site. https://ecos.fws.gov/ipac/ [December 8, 2018]

through September 1. If construction were to take place during the avian nesting season (February 1 through September 1), mitigation measures BIO-1 and BIO-2 would ensure that potential impacts to nesting birds covered under the Migratory Bird Treaty Act and California Fish and Game Code would be reduced to less than significant levels. Therefore, with implementation of mitigation measures BIO-1 and BIO-2 impacts would be less than significant.

Mitigation Measures

MM BIO-1: Pre-Construction Nesting Surveys. To avoid impacts on nesting bird, construction activities and construction noise shall occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occur within the bird nesting season (during the period from February 1 to September 1), all suitable habitats within 100 feet of the project site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the project site is occupied by nesting birds covered under the MBTA and California Fish and Game Code, MM BIO-2 shall apply.

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

e) **No Impact.** The project site includes nine Carrotwood trees (*Cupaniopsis anacardiodes*), one pine tree (*Pinus Spp*.), one desert willow (*Chilopsis linearis*), one Brazilian pepper (*Schinus terebinthifolius*), and one Chinese elm (*Ulmus parvifolia*). None of the trees proposed for removal are oak trees and thus are not subject to the City's Oak Tree Preservation Ordinance (87-11). Therefore, no impact would occur.

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

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 pursuant to in 15064.5?	□	□	☑	□
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	□	☑	□	□
c) Disturb any human remains, including those interred outside of formal cemeteries?	□	☑	□	□

Impacts to cultural resources were evaluated based on information in the cultural resources study provided in Appendix C.

a) **Less Than Significant Impact.** The proposed project would involve the demolition of a structure located at 127 West Pomona Avenue (APN: 8507-002-035) built in 1966 and a second structure located at 137 West Pomona Avenue (APN: 8507-002-033) built in 1997. The cultural resources records search results from the CHRIS-SCCIC (Appendix C) indicate that no historical resources are located within the project boundaries. Nine historic buildings and one historic structure are located within a one-mile radius of the project site. None of these historic structures would be impacted by the proposed project. Therefore, impacts would be less than significant.

b) **Less than Significant Impact with Mitigation Incorporated.** The proposed project includes excavation, grading, and earth-moving activity at a depth below 22 feet of existing grade. As such, the proposed project could have an impact on documented cultural resources on the project site if any are known to occur. A cultural resources report prepared by MIG on December 6, 2018 (Appendix C) addresses potential impacts to cultural resources on the project site. Significant impacts could occur to cultural resources if known cultural resources are located on the project site through excavation and soil disturbance. The Native American Heritage Commission Sacred Lands File Search identified that no known Native American cultural resources are within the project site or within a one-mile radius of the project site. The results of the records search from the CHRIS-SCCIC and the SLF resulted in no known Tribal Cultural Resources (TCR) within the project site or within a one-mile radius of the project site. Although no known cultural resources have been documented on the project site, excavation, and grading of the project site may unearth cultural resources not previously identified, mitigation measures have been incorporated to reduce impacts to unanticipated cultural resource discoveries. With mitigation incorporated, impacts would be less than significant.

Mitigation Measures

MM CUL-1. Conduct Archaeological Sensitivity Training for Construction Personnel. The applicant shall retain a qualified professional Archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall include a handout and focus on how to identify archaeological resources that may be encountered during earthmoving activities; the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional Archaeologist would follow in conducting a salvage investigation, if one is necessary.
Requirements and Timing: This Measure shall be printed on all construction drawings and grading plans. The archaeologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

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

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

resources encountered. Full-time monitoring can be reduced to part-time inspections as directed by the Project Archaeologist.
Requirements and Timing: This measure shall be printed on all construction drawings and grading plans. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM CUL-4. Prepare Report Upon Completion of Monitoring Services. The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the applicant, the South Central Coastal Information Center, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of construction activities and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA, and treatment of the resources. **Requirements and Timing:** This measure shall be printed on all construction drawings. An Archaeological Monitoring Report shall be prepared and submitted for City review and approval prior to final sign off on construction. **Monitoring:** City staff shall review and approve the archaeological monitoring report prior to final sign off on construction.

MM CUL-5. Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during construction, the City of Monrovia and the applicant shall comply with State Health and Safety Code Section 6050.5. The City of Monrovia and the applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, of the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of reburial with the NAHC and the Project Archaeologist shall file a record of the reburial with the CHRIS-SCCIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.
Requirements and Timing: This measure shall be printed on all construction drawings and grading plans. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

c) **Less than Significant Impact with Mitigation Incorporated.** No known human remains have been identified from the CHRISS-SCCIC database within one-mile of the project site or were identified during the site survey. These findings do not preclude the existence of previously unknown human remains located below the ground surface which maybe encountered during construction excavations associated with the proposed project. As a result, mitigation measures CUL-1 through CUL-5 are provided to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during project implementation to less than significant level.

4.6 – Energy

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?	□	☑	□	□
b) Conflict with or obstruct a state of local plan for renewable energy or energy efficiency?	□	□	☑	□

a) **Less Than Significant Impact with Mitigation Incorporated.** New construction in Los Angeles County accounts for a sizable cost to energy resources. Construction materials are transported to construction sites, utilized, and waste is generated from packaging, labor and installation.[17] The phased design of the construction of the building allows for a variety of efficiencies and energy usage reductions during project construction. The proposed project would be phased into work intervals such as site preparation, grading, and active construction. Overlapping construction phases are not anticipated to occur.

The proposed project would adhere to the 2016 Building Energy Efficiency Standards for Residential and Non-Residential building also known as Title 24, Part 6. Pursuant to the MMC Section 15.04.010 the proposed project would be required to comply with the 2016 Section 10-103 Permit and be required to obtain a Certificate of Compliance along with completing the Construction Document Design Review Checklist.[18] Construction operating hours of Monday through Friday from 7:00 AM to 5:00 PM (MMC Section 9.44). As no work is permissible after 7:00 PM the project would reduce potential usage of excessive lighting for night and or evening construction work. The project would implement procedures such as idle restrictions of vehicles, and recycling of construction materials where feasible. Though waste is anticipated during construction, the project would attempt to recycle as much waste as possible to comply with Greenhouse Gas reduction plans.

As part of the proposed project, the applicable requirements of General Plan Land Use and Circulation Elements EIR, included previously as mitigation measure MM AIR-1, would reduce unnecessary energy consumption onsite by placing idling restrictions of construction and passenger vehicle equipment The proposed project as noted in the Air Quality, Greenhouse Gas Report (Appendix A) is compliant with the

[17] County of Los Angeles Guide to New Construction Update 2015.
[18] 2016 Building Energy Efficiencies Standards.

General Plan and Energy Action Plan. Therefore, the proposed project would result in a less than significant impact.

Mitigation Measures

Refer to Mitigation Measure MM AIR-1.

b) **Less than Significant Impact.** Approximately 70 percent of California's electricity is generated from power plants located within the state and from plants in other states but owned by California utilities. A total of 17.1 percent of the state's energy is renewable energy, and 11.7 percent is by large hydropower. Electricity is the largest source of energy for buildings, and natural gas is the second largest source. [19]

State and local plans have adopted building code standards and energy efficiency standards to comply with state and federal requirements for energy efficiency. Title 24 energy efficiency standards on buildings was established to reduce energy consumption in the State of California. Leadership in Energy and Environmental Design (LEED) is the next step above Title 24. The City's Energy Action Plan adopted in 2008 includes 21 action items on major topics of sustainability, energy, waste reduction, urban design, urban nature, transportation, environmental health, and water. The City has implemented an Energy Action Plan which includes two energy policies. The City of Monrovia goal for 10 percent of renewable energy in use. The proposed project will have to meet Title 24 energy requirements and comply with California Building Code's (CBC) Zero Net Energy requirements if in affect at time of building permit issuance. Approximately 15% of the roof is designated as a solar zone to accommodate solar panels. Also, the applicant has stated a commitment to install EnergyStar appliances, which the City may impose as a condition of approval.

Table 4.6-1
Energy Efficiency Compliance Evaluation

POLICY GOAL	EVALUATION
The City of Monrovia General Plan Housing Element Policy 6.2 Green Building. Implement Monrovia's Green Building Program to ensure new development is energy and water efficient and consider establishing incentives to achieve energy efficiencies higher than those required by the Ordinance.	Existing land uses in the project site consume energy from natural gas in water and space heating equipment as well as industrial processes. The proposed project would generate emissions from combustion of natural gas in water and space heating units, and air conditioning units. The proposed project would not conflict with the City's General Plan Housing Element Policy 6.2 Green Building.
The City of Monrovia General Plan Housing Element Policy 6.3 Energy Efficiency and Alternative Energy Sources	The proposed project would utilize natural gas supplied by Southern California Gas Company, and electricity supplied by Southern

[19] U.S. Department of Energy. Energy Efficiency and Renewable Energy 2008.

Table 4.6-1
Energy Efficiency Compliance Evaluation

POLICY GOAL	EVALUATION
Promote modifications to increase energy efficiency and the use of alternative energy sources such as solar energy, cogeneration, and non-fossil fuels.	California Edison. Both suppliers support and utilize renewable energy practices in their supply capacity and distribution. In addition, smart appliances would be installed in the apartments and mixed-use commercial spaces to reduce the consumption of energy. Solar powered panels are not currently planned for the project, if such a measure was installed on the project roof, the building would be capable of generate alternative energy sources. The proposed project is new construction and would not propose modification to an existing building. Connections to new water, sewer and waste facilities would utilize new, smart energy efficient technologies for construction practices. Therefore, the proposed project would not conflict the ability of the City to adhere to the City of Monrovia General Plan Housing Element Policy 6.3 Energy Efficiency and Alternative Energy Sources.
The City has implemented an Energy Action Plan which includes two energy policies. City of Monrovia goal for 10 percent of renewable energy in use. Monrovia City Environmental Accords Energy Action 1: Adopt and implement a policy to increase the use of renewable energy to meet ten percent of the City's peak electrical load by 2015.	The proposed project would not conflict with the City's plan to provide renewable energy. The proposed project would utilize electricity provided by Southern California Edson, which accounts for a small portion of the City's consumption of non-renewable energy. The proposed project would therefore not conflict with the City's capability to adhere or administer Energy Action Item 1.
Monrovia City Environmental Accords Energy Action 2: Adopt and implement a policy to reduce the city's peak electric load by ten	The proposed project would comply with Energy Action 2, as the proposed project would include measures to lower the consumption of energy and thereby not contribute to a higher rate of energy

Table 4.6-1
Energy Efficiency Compliance Evaluation

POLICY GOAL	EVALUATION
percent within seven years through energy efficiency, shifting the timing of energy demands, and conservation measures.	consumption in the City of Monrovia. The proposed project would incorporate appliances that would comply with Section 110.1 (C) of the 2016 Building Energy Efficiency Standards and or is certified as a U.S. Department of Energy approved appliance. The proposed project would be a rental and leasing residential and commercial building. As such rental and leasing occupants would be restricted for installing appliances that are non-complaint with the 2016 Building Energy Efficiency Standards. When feasible the proposed project would incorporate renewable resources for building design. The proposed project would therefore not conflict with the City's capability to adhere or administer Energy Action Item 2.
Monrovia City Environmental Accords Adopt a citywide greenhouse gas reduction plan that reduces the Green Building Standards Code Amendments A4 301.1 Scope. Buildings shall be designed to include the green building measures specified as mandatory in this code. Voluntary green building measures are also included in this code the application checklists and may be included in the design and construction of structures covered by this code but are not required unless they are adopted by a city of county as specified in Section 101.7. of the City of Monrovia Municipal Code	The proposed project is a mixed-use commercial and residential project with a transportation-oriented focus. The proposed project was designed to allow for voluntary green building measures. As such the proposed project would incorporate energy efficient building and construction practices. When feasible the proposed project would incorporate renewable resources for building design. The proposed project would therefore not conflict with the City's capability to adhere or administer the Green Building Standards Code Amendments.

Table 4.6-1
Energy Efficiency Compliance Evaluation

POLICY GOAL	EVALUATION
Green Building Standards Code Amendments A4 405.4 Use of building materials from rapidly renewable sources. One or more of the following materials from rapidly renewable sources or by-products is used for a minimum of 2.5 percent of the total value, based on estimated cost of materials on the project: 1. Insulation 2. Bamboo or cork 3. Engineered products 4. Agriculturally based products 5. Other products acceptable to the enforcing agency	When feasible the proposed project would incorporate renewable resources for building design. The proposed project would therefore not conflict with the City's capability to adhere or administer the Green Building Standards Code Amendments.
Green Building Standards Code Amendments A4 407.1 Drainage around foundations. Install foundation and landscape drains which discharge to a dry well, sump, bioswale or other approved onsite location except when not required by state code or locally approved ordinance. A4.408.1 Enhanced construction waste reduction. Nonhazardous construction and demolition debris generated at the site is diverted to recycle or salvage in compliance with one of the following: Tier 1. At least a 65 percent reduction Tier 2. At least a 75 percent reduction A.5.6.1 Reduce Parking Capacity	The proposed project would comply with Green Building Standards and Code Amendments including installation of drought-tolerant landscape that would reduce watering energy consumption, and recycling of construction debris which would limit the overall energy consumption of disposal of waste. The proposed project incorporates bicycle parking and is considered a transit-oriented development which incorporates a multi-modal approach to occupant transportation needs. The proposed project would therefore not conflict with the City's capability to adhere or administer the Green Building Standards Code Amendments.

Table 4.6-1
Energy Efficiency Compliance Evaluation

POLICY GOAL	EVALUATION
A5.106.11.2 Cool Roof for reduction of heat island effect. Use roofing materials having a minimum aged solar reflectance and thermal emittance complying with Sections A5.106.11.2.1 and 5.106.11.2.2 or a minimum aged Solar Reflectance Index (SRI) complying with Section A5.106.11.2.3 and as shown in Table A5.106.11.2 for Tier 1 or Table A5.106.11.2.3 for Tier 2.	

The proposed project complies with the policies, plans, and ordinances noted in Table 4.6-1. Based on the Energy Efficiency Compliance Evaluation in Table 4.6-1 above and the Air Quality Greenhouse Gas Report (Appendix A), the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

4.7 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause 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?	□	□	□	☑
v) Result in substantial soil erosion or the loss of topsoil?	□	□	☑	□
vi) 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?	□	□	☑	□
vii) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	□	□	□	☑
viii) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	□	□	□	☑

b) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	☑	□	□

Analysis of impacts to geology and soils was based on geologic maps from the California Department of Conservation and the Geotechnical Engineering Investigation by Geotechnologies, Inc. dated October 19, 2018 in Appendix D.

a.i) No **Impact.** The project site is located in a seismically active Southern California region. The closest known major, active and potentially active earthquake faults to the project site include the Raymond Hill, Sierra Madre, Clamshell-Sawpit Section, Whittier and Newport-Inglewood Faults. The closest active fault, the Raymond Fault, is a left-lateral fault located approximately 12.2 miles northwest of the project site. According to the geotechnical report (Appendix D), the project site is not located in an Alquist-Priolo Earthquake Fault Zone, and no active faults are known to underlie or project toward the project site (Appendix D). The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map[20] issued by the State Geologist for the area or based on other substantial evidence of a known fault. Therefore, no impact would occur.

a.ii) **Less Than Significant Impact with Mitigation Incorporated.** The project site, similar to virtually all properties in Southern California, is subject to strong seismic ground shaking. The project is subject to the seismic design criteria of the California Building Code (CBC). The 2016 California Building Code (CBC; Title 14, California Code of Regulations, Part 2) contains seismic safety provisions with the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake. A design earthquake is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements and consideration of the project site's seismic coefficients would reduce the potential of the building from collapsing during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements would minimize damage to property within the structure because the structure is designed not to collapse. Therefore, with preparation and implementation of recommendations in these geotechnical reports as required by mitigation measure MM GEO-1 and MM GEO-2, strong ground shaking impacts associated with the proposed project would be less than significant.

Mitigation Measures

MM GEO-1. Prior to the issuance of grading permits, the project proponent/operator shall retain a California registered and licensed engineer to design the proposed project facilities to withstand probable seismically induced ground shaking at the project site. All grading and construction onsite shall adhere to the specifications, procedures, and site conditions contained in the final design plans, which shall be fully compliant with the seismic recommendations of the California-registered and licensed professional engineer and consistent with the recommendations in the Geotechnical Engineering Investigation by Geotechnologies, Inc. (2018) and any subsequent amendments.

[20] Alquist-Priolo Earthquake Fault Zoning Map [Accessed March 13, 2019]

Existing fill, in its present condition, is not suitable for direct support of proposed foundations or slabs, however, it is suitable for re-use as engineered fill provided grading recommendations in the geotechnical report are followed. Where new paving is to be placed, it is also recommended that all existing fill and soft or unsuitable soils be excavated and properly compacted for paving support. **Requirements and Timing:** The Geotechnical Report shall be reviewed and approved by the City Department of Public Works prior to issuance of grading permits. **Monitoring:** City Department of Public Works staff shall review and approve of the geotechnical report prior to issuance of grading permits.

MM GEO-2. Prior to the issuance of grading permits, the project proponent/operator shall retain a California registered and licensed engineer to finalize grading plans and building plans for proposed foundations or slabs. All grading and construction on site shall adhere to the specifications, procedures, and site conditions contained in the final design plans, which shall be fully compliant with the recommendations in the Geotechnical Engineering Investigation by Geotechnologies, Inc. (2018) and any subsequent amendments.
Requirements and Timing: The geotechnical engineers for the project shall sign a title block on the grading and drainage plans stating that the recommendations of the Project's geotechnical report have been followed in the approved plans that he or she is signing. **Monitoring:** City Department of Public Works staff shall confirm that the geotechnical engineer of record has signed the grading and drainage plans prior to issuance of grading permits.

a.iii) **Less Than Significant.** Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition due to the effects of increased pore-water pressure. This typically occurs where susceptible soils (particularly the medium sand to silt range) are located over a high groundwater table. A high groundwater table is described as one within 50 feet of the surface. The depth to groundwater on the site is approximately 200 feet. According to the geotechnical report (Appendix D[21]), the project site is not located in a mapped potential liquefaction zone on the State of California Seismic Hazards Zones Map. Therefore, the proposed project would not expose people or structures to potential ground failure due to liquefaction. Impacts would be less than significant.

a.iv) **No Impact.** The project site is not mapped in an area of potential earthquake-induced landslide movement on the State of California Seismic Hazards Zones Map[22]. Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site and surrounding area is in a flat, urbanized setting. Therefore, the project would not expose people or structures to injury or loss due to landslides; no impact would occur.

a.v) **Less Than Significant Impact.** There is a low likelihood of native topsoil occurring on the project site because the site has been developed and covered with paving and structures. The proposed project has the potential to expose superficial soils to wind and water erosion during construction activities. Wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Water erosion would be prevented through the City of Monrovia's standard erosion control practices required pursuant to the CBC and the National Pollution Discharge Elimination System (NPDES), such as silt fencing or sandbags. Following project construction, the project site would be covered completely by paving, structures, and landscaping. Therefore, impacts due to erosion of topsoil would be less than significant with implementation of

[22] State of California Seismic Hazards Zones Map [Accessed February 26, 2019]

existing regulations (e.g., SCAQMD Rule 403, MMC chapter 15.28, NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, adopted September 2, 2009, and revised by Order No. 2010-0014-DWG). Therefore, impacts would be less than significant.

a.vi) **Less Than Significant Impact.** The proposed project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the implementation of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Impacts related to liquefaction and landslides are discussed above in Sections 4.6.a.iii and 4.6.a. iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. As such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope.

Liquefaction occurs when seismic waves pass through saturated granular soil, distorting its granular structure, and causing some of the empty spaces between granules to collapse. Due to the absence of liquefaction potential on or near the project site (depth to groundwater is approximately 200 feet) and the urbanized character of the area, the potential for lateral spread occurring on or off the project site is considered negligible. Compliance with existing CBC regulations (Chapter 18) would limit hazard impacts arising from unstable soils to less than significant.

a.vii) **No Impact.** The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997). According to the geotechnical report (Appendix D)[23], the onsite material tested has a very low expansion potential. Moreover, because the project site is currently developed, subsurface soils would have been excavated and compacted in accordance with standard building code practices, including removal of any expansive or other non-engineered soils; no impacts related to expansive soils would occur.

a.viii) **No Impact.** The project site is served by a fully functional municipal sewer system. The proposed project would be required by the City of Monrovia to connect to the municipal sewer system. Therefore, no impact would occur.

b) **Less Than Significant Impact with Mitigation Incorporated.** According to the Natural History Museum of Los Angeles (NHMLAC) database, no known vertebrate fossil localities were identified on the project site or within a one-mile radius of the project site. The NHMLAC indicates that surface sediments on the site are composed of younger Quaternary Alluvium Quaternary Alluvium surface sediments are typically associated with a higher likelihood of paleontological resources. In addition, three fossil localities have been identified within 12 miles of the project site. As a result of these findings, recommended mitigation measures MM CUL-2, MM GEO-3, MM GEO-4, MM GEO-5, and MM GEO-6 are included to address the event of encountering undiscovered paleontological resources during grading operations. Therefore, potentially unique paleontological resources or site or geologic feature would not be impacted with mitigation incorporated.

Mitigation Measures

MM GEO-3: Conduct Paleontological Sensitivity Training for Construction Personnel
The applicant shall retain a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training would include a handout and would focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of Paleontological Monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional Paleontologist would follow in conducting a salvage investigation if one is necessary.
Requirements and Timing: Measure shall be printed on all construction drawings. The paleologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-4: Conduct Periodic Paleontological Spot Checks During Grading and Earth Moving Activities. The applicant shall retain a professional Paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct periodic paleontological spot checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks would be conducted at the discretion of the qualified paleontologist. If the qualified Paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources would be required. The applicant shall retain a qualified Paleontological Monitor, who would work under the guidance and direction of a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The Paleontological Monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple Paleontological Monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional Paleontologist.
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-5: Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources are Encountered. If paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-6: Prepare Report Upon Completion of Monitoring Services. Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. **Requirements and Timing:** Measure shall be printed on all construction drawings. A paleontologist report shall be prepared and submitted for City review and approval prior to final sign off on construction. **Monitoring:** City staff shall review and approve the monitoring report prior to final sign-off on construction.

4.8 – 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?	□	□	□	☑

The CalEEMod Emissions Estimator model was used to analyze Air Quality and Greenhouse Gas Emission impacts. The Air Quality and Greenhouse Gas Report can be found in Appendix A of this report.

a) **Less Than Significant Impact.** Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). GHG that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants because climate change is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. The six most common GHG's are:

- Carbon Dioxide (CO_2)
- Methane (CH4)
- Nitrous oxide (N2O)
- Sulfur hexafluoride
- Hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs). GHG emissions from human activities contribute to overall GHG concentrations in the atmosphere and the corresponding effects of global climate change (e.g., rising temperatures, increased severe weather events such as drought and flooding). GHGs can remain in the atmosphere long after they are emitted. The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO_2, which has a GWP of one. By comparison, CH_4 has a GWP of 25, which means that one molecule of CH_4 has 25 times the effect on global warming as one molecule of CO_2. Multiplying the estimated emissions for

non-CO_2 GHGs by their GWP determines their carbon dioxide equivalent (CO_2e), which enables a project's combined global warming potential to be expressed in terms of mass CO_2 emissions.

Existing GHG Emissions

The project site's existing GHG emissions are summarized in Table 4.8-1.

Table 4.8-1
Existing Project Site GHG Emissions

Source	Annual GHG Emissions (Metric Tons per Year) CO_2	CH_4	N_2O	TOTAL MTCO2e
Area	<0.00(A)	<0.00(A)	<0.00(A)	<0.00(A)
Energy(B)	253.9	<0.00(A)	<0.00(A)	254.9
Mobile(C)	149.3	0.01	0.01	151.3
Waste	8.7	0.52	<0.00(A)	21.7
Water	36.2	0.27	<0.00(A)	44.8
Total Existing GHG(D)	448.1	0.80	0.01)	472.7

Source: MIG, 2018 (see Appendix A)

(A) "<0.00" does not indicate the emissions are less than or equal to 0; rather, it indicates the emission is smaller than 0.01 but larger than 0.000.

(B) The emissions estimated in CalEEMod account for the carbon intensity metrics provided in Southern California Edison's 2016 Corporate Responsibility and Sustainability Report (SCE, 2016) and U.S. Environmental Protection Agency's eGrid2014v2 emission rates (USEPA, 2017).

(C) CalEEMod 2016.3.2 does not incorporate GHG emissions reductions resulting from the State's Low Carbon Fuel Standards (LCFS). Although LCFS largely reduces GHG from upstream fuel processing (and not individual tailpipe emissions) the aggregate effect on transportation fuels is a reduction in GHG emissions throughout the state from lower fuel carbon content. Accordingly, this EIR analysis reduces transportation combustion emissions pursuant to LCFS requirements. Based on the latest estimate available from CARB, the LCFS regulation resulted in a 2.5% reduction in average carbon intensity content in 2016 and should result in a 7.5% reduction in average carbon intensity in 2020. Thus, CalEEMod transportation emissions were adjusted by multiplying by a factor of 0.925 to account for the LCFS regulation (CARB 2018a, 2018b).

(D) Totals may not equal due to rounding.

Project GHG Emissions

The proposed project would generate GHG emissions from both short-term construction and long-term operational activities. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed SCAQMD-recommended pollutant thresholds. In December 2008, the SCAQMD Governing Board adopted a GHG significance threshold of 10,000 MTCO2e for industrial projects where the SCAQMD is lead agency; however, the City would be the lead agency for the proposed project. The SCAQMD has not formally adopted GHG thresholds for local lead agency consideration; the proposed thresholds are tiered as follows:

- Tier 1 consists of evaluating whether or not the project qualifies for applicable CEQA exemptions.
- Tier 2 consists of determining whether or not a project is consistent with a greenhouse gas reduction plan. If a project is consistent with a greenhouse gas reduction plan, it would not have a significant impact.
- Tier 3 consists of using screening values at the discretion of the Lead Agency; however, the Lead Agency should be consistent for all projects within its jurisdiction. The following thresholds were proposed for consideration:
    - 3,000 MTCO2e/year for all land use types; or

  - 3,500 MTCO2e/year for residential; 1,400 MTCO2e/year for commercial; 3,000 MTCO2e/year for mixed use projects.
- Tier 4 has three options for projects that exceed the screening values identified in Tier 3:
  - Option 1: Reduce emissions from business as usual by a certain percentage (currently undefined)

The SCAQMD's draft proposed threshold use Executive Order S-3-05 goal as the basis for the Tier 3 screening levels. Achieving the objectives of Executive Order would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, stabilizing global climate change. Specifically, the Tier 3 screening levels are based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified projects would be subject to a CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact report, which includes analyzing feasible alternatives and imposing feasible mitigation measures. This capture rate sets the emission threshold low enough to capture a substantial fraction of future projects that would be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that would in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions.

To determine whether the proposed project's GHG emissions could significantly impact the environment, this analysis uses the SCAQMD's draft local agency Tier 3 threshold of 3,000 MTCO2e per year for mixed-use projects. Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the project site during demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year until the project is decommissioned. The SCAQMD recommends amortizing construction GHG emissions over a 30-year period and including with operational emissions estimates. This normalizes construction emissions so that they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. GHG emissions from construction of the proposed project were estimated using CalEEMod, Version 2016.3.2, based on the anticipated construction schedule and construction activities described in Section 3 of the AQ/GHG Report. The proposed project's total construction emissions, as estimated using CalEEMod V.2016.3.2, are shown in Table 4.8-2.

Table 4.8-2
Project Construction GHG Emissions

Source	Annual GHG Emissions (Metric Tons per Year)			
	CO_2	CH_4	N_2O	TOTAL $MTCO_2e$
2020	1,114.4	0.14	0.11	1,151.1
2021	820.5	0.09	0.08	847.3
2022	20.4	0.00	0.00	21.1
Total(A)	1,955.4	0.23	0.20	2,019.5
Amortized GHG Estimate(B)	65.2	0.01	0.01	67.3

Source: MIG, 2018 (see Appendix A)
(A) Totals may not equal due to rounding.
(B) Emissions are amortized over the life of the project, which is presumed to be 30 years.

Once operational, the proposed Project would generate emissions of GHGs from area, energy, stationary, mobile, water/wastewater, and solid waste sources. The net change in emissions of GHG that would occur with implementation of the proposed project was modeled using CalEEMod, Version

2016.3.2. The operational emissions were modeled based on the project's first full year of operation (2023).

The proposed project's net increase in GHG emissions, as estimated using CalEEMod V.2016.3.2, are shown in Table 4.8-3.

Table 4.8-3
Project Operational GHG Emissions (Net Change)

Emission Source	GHG Emissions (MTCO2e / Year) Existing[A]	Proposed	Net Change
Area	0.0	5.4	+5.4
Energy	254.9	1,307.4	+1,052.5
Mobile[B]	151.3	1,536.1	+1,385.2
Stationary	0.0	0.0	+0.0
Waste	21.7	23.2	+1.5
Water	44.8	208.7	+163.9
Amortized Construction	0.0	67.3	67.3
Total[C]	472.7	3,080.8	2,608.4
SCAQMD Tier 3 Screening Threshold	–	–	3,000
SCAQMD Tier 3 Threshold Exceeded?	–	–	No

Source: MIG 2018 (see Appendix C).
(A) See Table for existing GHG emissions in the project site.
(B) CalEEMod 2016.3.2 does not incorporate GHG emissions reductions resulting from the State's LCFS. Although LCFS largely reduces GHG from upstream fuel processing (and not individual tailpipes) the aggregate effect on transportation fuels is a reduction in GHG emissions throughout the state from lower fuel carbon content, including from the combustion of fuels in motor vehicles. Accordingly, this EIR analysis reduces transportation combustion emissions pursuant to LCFS requirements. Based on the latest estimate available from CARB, the LCFS regulation resulted in a 2.5% reduction in average carbon intensity content in 2016 and should result in a 5% reduction in average carbon intensity in 2018. The current LCFS regulation also requires a 10% reduction in average carbon intensity by 2023. Thus, CalEEMod transportation emissions were adjusted by multiplying by a factor of .925 (existing conditions) and 0.90 (proposed project) to account for the LCFS regulation (CARB 2018a, 2018b).
(C) Totals may not equal due to rounding.

As shown in Table 4.8-3, the proposed project's potential increase in GHG emissions would be below the SCAQMD's latest interim guidance and recommendation for GHG significance thresholds for mixed-use land uses (3,000 $MTCO_2e$). Impacts for the proposed project would be less than significant.

b) **No Impact.** The proposed project would not conflict with CARB's Scoping Plan, the regional SCS, the City of Monrovia's General Plan, or the City's Energy Action Plan. The proposed project's consistency with these plans is described in more detail below.

CARB Scoping Plan
As discussed in the Air Quality Greenhouse Gases Report, the 2017 Climate Change Scoping Plan is CARB's primary document used to ensure State GHG reduction goals are met. The plan identifies an increasing need for coordination among State, regional, and local governments to achieve the GHG emissions reductions that can be gained from local land use planning and decisions. The major elements of the 2017 Climate Change Scoping Plan, which is designed to achieve the State's 2030 GHG reduction goal, are listed in the Air Quality Greenhouse Gases Report. Nearly all of the specific measures identified in the 2017 Climate Change Scoping Plan would be implemented at the state level, with CARB and/or another state or regional agency having the primary responsibility for achieving

required GHG reductions. The proposed project, therefore, would not directly conflict with any of the specific measure identified in the 2017 Climate Change Scoping Plan.

Southern California Association of Governments RTP/SCS

The 2016 RTP/SCS is a growth strategy and transportation plan whose primary intent is to demonstrate how the SCAG region would meet its GHG reduction target through the year 2040. Many of the measures included in the RTP/SCS are focused on: the expansion of, and access to, mass transit (e.g., light rail, commuter rail, bus rapid transit, etc.); planning growth around livable corridors; and locating new housing and job growth in high quality transit areas. The implementation of the proposed project would support these goals, because it (1) results in and encourages infill development and/or involves the revitalization of already developed areas, (2) has existing, supporting transit infrastructure and enhances the use of this infrastructure (the Monrovia Metro Station is a 0.1-mile walk to the south of the project boundary), and (3) encourages the use of non-vehicular modes of transportation. Under California law, SCAG is required to implement strategies that reduce per capita GHG emissions in the region by eight percent by 2020—compared with 2005 levels—and by 19 percent by 2035 (CARB, 2018c). The proposed Project would result in transit-oriented development, support the use of mass transit, and result in vehicle trips that are approximately 20% lower than standard values due to the proximity of the Gold Line Monrovia Station. Therefore, the proposed project would not conflict with the SCAG 2016 RTP/SCS.

City of Monrovia Energy Action Plan

The City of Monrovia, along with Southern California Edison and Intergy Corporation, has implemented an Energy Action Plan that contains goals and specific actions to ensure that sufficient, dependable, and reasonably-priced electrical power and energy supplies are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for the city's consumers and taxpayers. The Energy Action Plan looks at self-generation and demand reduction strategies that can further offset the energy, water, and transportation needs for the city of Monrovia, including the use of renewable energy sources. Appendix A to the Energy Action Plan includes the City’s environmental accords or actions; however, none of these actions are directly applicable to individual development projects. Rather, Appendix A to the Energy Action Plan primarily lists actions that apply to City equipment, electricity consumption, and GHG emissions sources, or which would be implemented on a City-wide basis. Therefore, the proposed project would not conflict with the SCAG 2016 RTP/SCS.

The proposed project would not conflict with CARB’s Scoping Plan, the regional SCS, the City of Monrovia’s General Plan, or the City’s Energy Action Plan. No impact would occur.

4.9 – Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	□	□	☑	□
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	□	☑	□	□
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	□	☑	□	□
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	□	□	☑	□
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	□	□	□	☑
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	□	□	☑	□
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	□	□	□	☑

A Phase I Environmental Site Assessment was performed by AEI and documented in a report dated August 13, 2018 (see Appendix E) and a Phase II Environmental Site Assessment was performed by AEI and documented in a report dated December 6, 2018 and February 26, 2019 (Appendix F). This section summarizes the results of those assessments.

a) **Less Than Significant Impact.**

Phase I – Environmental Site Assessment
The Phase I Environmental Site Assessment (Phase I ESA) identified that the project site was used for agricultural purposes and a lumber yard from 1952 to 1995. Two industrial buildings exist on the site at present. According to the Phase I ESA, the building at 123 West Pomona Avenue was constructed around 1966. Because of the age of this structure, asbestos-containing materials (ACM) could have been used in its construction. (ACM were used on a widespread basis in building construction prior to and into the 1980s.) Asbestos generally does not pose a threat when it remains intact. However, when asbestos is disturbed and becomes airborne, such as during demolition activities, significant impacts to human health could occur. Construction workers completing demolition activities, as well as surrounding uses, have the potential to be exposed to airborne asbestos emissions due to the potential presence of ACM.SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires work practices to limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM. This rule is generally designed to protect uses and persons adjacent to demolition or renovation activity from exposure to asbestos emissions. Rule 1403 requires surveys of any facility being demolished or renovated for the presence of all friable ACM and Class I and Class II non-friable ACM. Rule 1403 also establishes notification procedures, removal procedures (including HEPA filtration, glove bag, wetting, dry removal, and/or an approved alternative), handling operations, and warning label requirements. With adherence to SCAQMD Rule 1403, project impacts related to ACM would be less than significant.

During the site reconnaissance, AEI observed electrical or mechanical equipment likely to contain fluids. no mold or above ground or below ground storage tanks were observed. Evidence of prior usage of storage of hazardous substances was not on file with the CMBD. In addition, the project site was previously utilized as a lumber yard. Lumber yards are known to contain storage of wood that includes chemical treated lumber. Both existing buildings were constructed prior to 1977, and it is possible that Lead Based Paint was used. Overall, the paint coatings of all structures were determined to be in good condition during a site reconnaissance conducted for the Phase I ESA.

Based on the findings of the Phase I ESA, a Phase II ESA was recommended due to the former use as a lumber yard a recognized environmental condition (REC). Soil sampling was recommended to assess whether the historical lumber yard operations have adversely impacted the site subsurface.

Phase II – Limited Soil Investigation
The Phase II ESA included soil borings on the project site that collected nine samples. One soil sample from each boring (B-1 through B-9) with the highest photo ionization detector reading was selected for laboratory analysis. A photo ionization detector reading provides a reading that determines if there is gas present. The study also found a below ground anomaly consistent with the signature of a small underground storage tank (UST) or clarifier in the area of boring B-9. Upon follow up exploratory digging performed by AEI in December 2018, a large rock was identified in the area of concern, and no UST was discovered. AEI submitted the soil sample from the anticipated depth from below this feature for the additional analysis of total petroleum Hydrocarbons (TPH).

Soil samples submitted to the laboratory for analysis as part of this investigation were analyzed for semi-volatile organic compounds (SVOCs), metals, and TPH. The results of the laboratory analysis

indicated that Phenol was detected in one soil sample (B-6-10') above the laboratory reporting limit. The concentration of phenol detected was below both its residential and industrial regional screening levels (RSLs). No other SVOCs were detected at concentrations at or above their respective statistical level of detection known as practical quantization limits (PQLs) in the soil samples submitted for analysis. Metals were detected in the soil samples; however, the detected concentrations were below their respective regulatory screening levels and/or were within established background levels. TPH was not detected at or above the PQL in the single soil sample analyzed. The Phase II ESA indicated that no further action is warranted.

The Phase II assessment concluded that no evidence of RECs or CRECs in connection with the project site. The project would be required to comply with construction practices that include measures to prevent, contain, and/or clean-up spills and contamination from fuels, solvents, concrete wastes, and other waste materials, and because use and transport of all hazardous materials would be required to follow federal, state, and local regulations, risk of upset of hazardous materials from accidents would be less than significant. Therefore, impacts would be less than significant.

Routine Transport and Use of Small Quantity Hazardous Materials

Construction of the proposed project, as well as ongoing maintenance over time, may involve the intermittent transport, use, and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction and maintenance. During construction activities, any onsite hazardous materials that may be used, stored, or transported would be required to follow standard protocols and regulations for maintaining health and safety as such the proposed project would comply with governing building codes and development codes including:

- State of California Fire Code
- National Fire Protection Association
- Standard Specifications for Public Works Construction
- American Water Works Association

Hazardous waste would be stored in sealed containers, and leaks and spills would be required to be cleaned up immediately. Future residential, retail, and service uses would also be expected to use typical household hazardous substances associated with urban uses (e.g., paint, cleaners) that may be generated, stored, transported, used, or disposed, and would be subject to applicable local, state, and federal regulations. Future residential uses would be unlikely to involve routine transport, use, or disposal of hazardous materials, or result in hazardous emissions. In addition, Los Angeles County holds free household hazardous waste and e-waste collection events in various locations almost every week. Therefore, with compliance with existing City policies and federal, state, and local regulation (such as the requirement of Health Hazardous Materials Division of Los Angeles County Fire to track and inspect hazardous materials), the potential threat to public health and safety or the environment from hazardous materials transport, use, or disposal would be less than significant.

The project site is located on West Evergreen Avenue, which is identified as an active hazardous materials transportation access road (Fehr & Peers/Kaku Associates 2009 Traffic Impact Study Station Square Transit Village Specific Plan). The proposed project primary access is via West Pomona Avenue and West Primrose Avenue. Access restrictions to the project site from via West Evergreen Avenue have been incorporated to reduce impacts to traffic on West Evergreen Avenue. West Pomona Avenue and South Primrose Avenue—neither of which are designated hazardous material transportation routes—would be utilized as the primary entry points to the project site. Therefore, the proposed project would not impact the previously identified active hazardous materials transportation access route of West Evergreen Avenue. The proposed project would have a less than significant impact on a routine transport for use, or disposal of hazardous materials as the proposed project would not significantly

impact traffic on West Evergreen Avenue. Hazardous material would not be stored onsite for an extended period.

Temporary and periodic storage of hazardous materials for use in commercial businesses onsite would occur. All hazardous material would be stored on the project site in compliance with all federal, state, and local regulations. Demolition of existing structures onsite (including disposal of demolition debris) would be required to comply with state and federal regulations pertaining to lead exposure (Title 8 California Code of Regulations Section 1532.1 California Construction Safety Orders for Lead). Therefore, with adherence to federal, state, and local regulations, project impacts related to lead-based paints would be less than significant.

b) **Less Than Significant Impact with Mitigation.**

Phase I Environmental Site Assessment
The Phase I Environmental Site Assessment (Phase I ESA) identified that the project site was used for agricultural purposes and a lumber yard from 1952 to 1995. Two industrial buildings exist on the site at present. According to the Phase I ESA, the building at 123 West Pomona Avenue was constructed around 1966.

During the Phase I ESA site reconnaissance, AEI observed electrical or mechanical equipment likely to contain fluids. No mold, aboveground tanks, or below ground storage tanks were observed. Evidence of prior usage of storage of hazardous substances was not on file with the CMBD. However, the project site was previously utilized as a lumber yard. Lumber yards are known to contain storage of wood that includes chemical treated lumber. Both existing buildings were constructed prior to 1977, and it is possible that lead based paint was used. Overall, the paint coatings of all structures were determined to be in good condition during a site reconnaissance conducted for the Phase I ESA.

Based on the findings of the Phase I ESA, a Phase II ESA was recommended due to the former use of the site as a lumber yard which was determined to be a recognized environmental condition (REC). Soil sampling was recommended to assess whether the historical lumber yard operations have adversely impacted the site's subsurface.

Phase II – Limited Soil Investigation
The Phase II ESA included soil borings on the project site that involved collection of nine samples. One soil sample from each boring (B-1 through B-9) with the highest photoionization detector reading was selected for laboratory analysis. A photoionization detector reading provides a reading that determines if there is gas present. Soil samples submitted to the laboratory for analysis as part of this investigation were analyzed for semi-volatile organic compounds (SVOCs), metals, and TPH. The study also found a below ground anomaly consistent with the signature of a small underground storage tank (UST) or clarifier in the area of boring B-9. Upon follow up exploratory digging performed by AEI in December 2018, a large rock was identified in the area of concern, and no UST was discovered. AEI also submitted a soil sample from the anticipated depth below this feature for additional analysis of total petroleum hydrocarbons (TPH). The results of the laboratory analysis indicated that phenol was detected above the laboratory reporting limit in one soil sample collected at 10 feet below the ground surface (B-6-10'). The concentration of phenol detected was below both residential and industrial regional screening levels (RSLs). No other SVOCs were detected at concentrations at or above their respective levels of detection known as the practical quantitation limits (PQLs). Metals were detected in the soil samples; however, the detected concentrations were below their respective regulatory screening levels and/or were within established background levels. TPH was not detected at or above the PQL in the single soil sample analyzed.

The Phase II assessment concluded that there is no evidence of RECs or CRECs in connection with the project site. The Phase II ESA recommended that no further action is warranted.

Hazardous Materials Sites
The Phase I ESA determined that the project site is in the vicinity of sites included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 (Cortese List), Envirostor (www.envirostor.dtsc.ca.gov), and Geotracker (geotrackerl.waterboards.ca.gov), accessed on December 19, 2018 and August 28, 2019. The property at 1601 South Myrtle Avenue, located immediately southeast of the site, across Pomona Avenue, was identified as an open case (RB Case No. R-25712). The former service station on the site (now used as a parking lot for the Metro Gold Line station) was identified as having a leaking underground storage tank (LUST). No other information is available for this case. However, neither the Phase I nor Phase II investigations for the proposed project identified any contamination associated with this site. Also, mitigation measures HAZ-1 and HAZ-2 will guard against exposure to any previously undiscovered contamination. Impact would be less than significant.

Hazardous Materials Release
Detection of phenol in soil on the project site above its PQL, indicating a potential release of a hazardous substance onto the subject property. This evidence of a release is subject to CERCLA. In addition, the Santa Fe Middle School is located within a quarter mile of the project site (approximately 0.16 miles to the southwest). As such, the California Environmental Protection Agency (Cal/EPA) must be notified of the potential release and a Pre-CERCLA Screening process must be performed by Cal/EPA to determine if the potential release is subject to review under the CERCLA process. Failure to fully investigate and remove or remediate the contamination as required pursuant to CERCLA would potentially result in exposure of construction workers or future residents to hazardous substances having the potential to cause adverse health effects. Without mitigation, impacts would be significant. However, mitigation measures MM HAZ-1 and MM HAZ-2 require a Site Management Plan and compliance with the CERCLA process for the investigation and removal or remediation of contamination on the project site. With implementation of these mitigation measures, impacts would be reduced to less than significant levels.

Mitigation Measures

MM HAZ-1: The developer shall prepare a Site Management Plan (SMP) for the proposed construction-related excavation and grading activities. The SMP shall address plans for encountering, handling, and disposing of soil potentially impacted by hazardous materials (including pesticides) and/or petroleum products or other yet unidentified features or conditions that may exist.
Requirements and Timing: A qualified hazardous materials consultant shall review the Phase I ESA and develop the Site Management Plan in compliance with ASTM Standard Practice and EPA Standards and Practices. If required by law, the SMP shall be submitted to the appropriate agency, and documentation of SMP approval shall be provided to the City prior to the issuance of a demolition permit.
Monitoring: City Building and Safety Division staff shall confirm implementation of the Site Management Plan during demolition, grading, and construction.

MM HAZ-2: The California Environmental Protection Agency (Cal/EPA) shall be notified by the City of Monrovia of the results of the Phase I Environmental Site Assessments (ESA) and Phase II (ESA) prepared for the project. All requirements of Cal/EPA, or another regulatory agency granted oversight authority by Cal/EPA under CERCLA, shall be complied with prior to issuance of grading permits for the portion of the project area subject to CERCLA.
Requirements and Timing: City Planning shall forward copies of the Phase I ESA and the Phase II ESA to Cal/EPA immediately. **Monitoring:** City staff shall ensure that all Cal/EPA requirements are

complied with prior to issuance of grading permits for the portion of the project area subject to CERCLA. Cal/EPA shall determine which portion of the project area is subject to CERCLA.

c) **Less than Significant Impact with Mitigation Incorporated.** The closest schools are Santa Fe Middle School (approximately 0.16 miles to the southwest), Mountain Park School 1.0 miles northeast), Canyon Oaks High School (approximately 1.0 mile), and Quest Academy Community Day School (approximately 1.05 miles northeast). As noted in the discussion for items a and b above, with implementation of Mitigation Measures MM HAZ-1 and MM HAZ-2, project impacts relative to the release of hazardous materials near schools would be less than significant.

Mitigation Measures

Refer to Mitigation Measures MM HAZ-1 and MM HAZ-2.

d) **Less than Significant Impact.** The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

The project site is in the vicinity of sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), including Envirostor (http://www.envirostor.dtsc.ca.gov/) and GeoTracker (http://geotracker.waterboards.ca.gov/), both accessed on December 19, 2018.The Phase I/Phase II reviewed EnviroStor, GeoTracker, and other hazardous materials databases, and determined that only one site, 727 South Myrtle Avenue located approximately 140 feet northeast of the project site, was identified as contaminated. This site contained a 14,000-gallon diesel underground storage tank and a 1,000-gallon underground tank (of unknown contents). According to the Phase I/Phase II ESA, the site was issued "case closed" status on the GeoTracker database on September 11, 1989. The State Water Resources Control Board evaluates sites on the basis of multiple closure criteria to determine if any further actions are warranted (e.g., soil or water quality monitoring for contaminants, remediation). Therefore, this impact would be less than significant.

e) **No Impact.** There are no public airports or private airstrips within two miles of the project site. The closest airport is San Gabriel Valley Airport, a single runway general aviation airport located about 5.1 miles southwest of the project site. The nearest major commercial airport is the Hollywood Burbank Airport, located approximately 21 miles to the west. The closest private airport is the Wells Fargo-El Monte Heliport, about seven miles southwest of the project site. Therefore, there would be no impact related to airport safety hazards.

f) **Less Than Significant Impact.** The proposed project, with implementation of existing planning, fire, safety and building code requirements, would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project parking access would be two floors at subterranean levels and would allow for ingress and egress as specified by the City of Monrovia building and safety code requirements. In addition, West Evergreen Avenue provides freeway access and also would function as an evacuation route. The proposed project would not create, interrupt, or otherwise reduce the ability of these streets to convey traffic. The current street configuration would not change, and the route that public safety vehicles may take would be unimpeded under proposed project operation. Therefore, proposed project impacts on emergency response and evacuation plans would be less than significant.

g) **No Impact.** The project site is not located within a state-identified fire hazard zone, as indicated on the latest Fire Hazard Severity Zone maps prepared by the California Department of Forestry and Fire

Protection (CALFIRE).[24] According to the General Plan, a high fire hazard zone exists in Monrovia but is located to the north of West Hillcrest Boulevard (roughly 1.0 miles from the project). The project site is in the urbanized portion of Monrovia, and no wildland conditions are known to occur; therefore, no impact would occur.

[24] http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf; accessed 12/31/18.

4.10 – 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 or otherwise substantially degrade surface or ground water quality?	□	□	☑	□
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	□	□	□	☑
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:			☑	
i) result in substantial erosion or siltation on-or off-site;	□	□	□	☑
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-offsite;	□	□	☑	□
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	□	□	□	☑
iv) Impede or redirect flood flows?	□	□	□	☑
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	□	□	□	☑
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	□	□	☑	□

a) **Less Than Significant Impact.** The City of Monrovia is a member of the Los Angeles County Storm Water Program, which regulates and controls storm water runoff. The Los Angeles County Storm water Program is the local enforcement mechanism of the National Pollutant Discharge Elimination System (NPDES), which controls pollutants into waters of United States. NPDES are permits filed with the California Regional Water Quality Control Board, Los Angeles Region (LARWQCB). As required, prior to issuance and approval of grading permit and final map, the Department of Public Service (Public Works Division) will review and approve all plans to ensure they comply with federal, state and local requirements. The following categories of pollutants are provided.

Point Source Pollutants
Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The proposed project, which consists of a development of 310 dwelling units and retail and service-related uses, does not propose any uses that would generate point source pollutants.

The proposed project would comply with MMC Chapter 12.36 (Storm Water and Urban Runoff and Pollution Control), which requires compliance with the current MS4 Permit (Order No. R4-2012-0175). Required measures reduced the water quality impacts of development by integrating Low Impact Development (LID) practices and standards for storm water pollution mitigation through means of infiltration, evapotranspiration, bio-filtration, and rainfall harvest and use. In addition, unless otherwise exempted in Chapter 12.36 or in the MS4 Permit, the proposed project must comply with Part VI.D.7.c of the MS4 Permit and be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bio-retention and/or rainfall harvest and use in accordance with the requirements set forth in the MS4 Permit and the LID Standards Manual.

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

- Oil
- Grease
- Toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites
- Atmospheric deposition and hydromodification

Impacts associated with urban water pollution include sickness or injury to people and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management, or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading, and storage areas, or result in contaminated discharges directly into the storm drain system. As a co-permittee under Los Angeles County's MS4 NPDES permit, the City of Monrovia is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water sources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials. Violations of water quality standards or waste discharge

requirements, or degradation of water quality, can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations.

Construction
Project construction would disturb approximately 1.83 acres of land, and therefore would be subject to the City's NPDES permit requirements during construction activities, in addition to standard NPDES operational requirements. The City of Monrovia would require the project's use of BMPs, as listed in the California Storm Water Quality Association's California Storm Water Best Management Practice Handbooks. The post-construction BMPs would include drywells for infiltration and hydrodynamic separators (CDS units) as pre-treatment to the drywells. Temporary BMPs would likely include, but not be limited to gravel bags, silt fences; gravel beds/rumble plates, dumpsters, storage areas, concrete washout areas, and portable toilets.

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

Drainage
Drainage inlets would be constructed within the project site to relay onsite runoff to the proposed storm water treatment systems for the site. The proposed storm water treatment system for the site consists of two separate drywell systems with underground detention. As a result, impacts related to violation of water quality standards would be less than significant. As required, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the proposed project and as required by the State Water Resource Control Board. While the proposed project is in construction, temporary construction BMP's as well as erosion control measures would be put in place to reduce construction and post-construction siltation. Both the existing and project site conditions are, or would be, fully developed, and no exposed soils would be present to provide for any erosion potential.

In conclusion, the proposed project would result in a significant impact to water quality as it will not violate water quality standards or waste discharge requirements, nor result in the degradation of water quality. The proposed project is not anticipated to issue point-source pollutants, result in impacts to drainages, or result in water quality impacts. The proposed project would not violate any water quality standards or waste discharge requirements; therefore, the impact would be less than significant.

b) **No Impact.** The proposed project would not substantially increase impervious surfaces when compared to the existing onsite development, as the project site is already an urbanized and impacted environment. The impervious surface area for the existing site is 1.83 acres, and the impervious surface area for the proposed project is 1.83 acres. The proposed drainage system for the site consists of two separate proposed dry well systems. While providing stormwater treatment as required by LID design requirements, the proposed drywells would serve to recharge the groundwater within the area through infiltration of captured storm water. Dewatering operations and depletion of groundwater supplies is not anticipated to be required to facilitate the proposed development. Therefore, operation of the proposed project would not result in increased runoff compared to existing conditions. No impact would occur as there would be no substantial depletion of groundwater supplies and no interference with groundwater

recharge that would result in a net deficit in aquifer volume or a lowering of the local groundwater table level.

c) **Less Than Significant Impact.** No streams traverse the project site; thus, the proposed project would not result in the alteration of any stream course. The project site is currently developed and fully covered with buildings and pavement. Thus, the project would result in a similar condition relative to impervious surfaces coverage; therefore, the proposed project is anticipated to generate similar or lower levels of runoff relative to existing uses. The proposed drywell structures would serve as the permanent BMPs for the site. A SWPPP would be prepared for the proposed project as required by the State Water Resource Control Board. Therefore, with implementation of existing regulations, impact would be less than significant.

i) **No Impact.** The proposed project would not result in an alteration of the drainage pattern or increase in flows that would result in flooding on or off site because all on- and off-site drainage would be controlled by existing storm drain and flood control facilities; further, runoff would not increase substantially beyond existing flow rates. Drainage patterns would not be altered on or offsite. Therefore, no impact would occur.

ii) **Less Than Significant Impact.** As discussed above, the proposed project is not anticipated to generate substantial additional runoff beyond what already exists. Based upon the requirements of the City's Storm Water Management Ordinance, MMC 12.36 and the Los Angeles County Municipal Storm Water National Pollutant Discharge Elimination System (MS4 NPDES) Permit issued by California Regional Water Quality Control Board, Los Angeles Region, the applicant/developer would be required to develop and implement a SWPPP; this would prevent polluted runoff from leaving the construction site. Operationally, the proposed project would include BMPs as detailed in Section 4.10 (a) above to reduce pollutants in runoff. Therefore, impacts would be less than significant.

iii) **No Impact.** The proposed project does not propose or include any uses that would have the potential to otherwise degrade water quality beyond those issues discussed in this Section (4.10). The proposed project would not result in increased runoff or in an increase in pollutants during storm events that could degrade water quality. Therefore, no impact would occur.

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

d) **Less than Significant Impact.** According to the FEMA flood map Firm Panel 06037C1400F, the project site is not located adjacent to any levee or within an area potentially subject to flooding as the result of a potential levee failure. The project site is located approximately three miles from the Santa Anita Dam and is located within its dam inundation area. According to the General Plan Safety Element, the Santa Anita Dam has a capacity of 1,376 acre-feet. If the Santa Anita Dam failed at maximum capacity, the drainage area would be 11 square miles. Most of the flooding would occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of I-210 Freeway. The County of Los Angeles' emergency response plans, as administered by the County of Los Angeles Office of Emergency Management, along with mutual aid from local jurisdictions, would implement their evacuation plans should such a dam inundation threaten the area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Based on the distance of the project site from the dam, dam

evacuation plans, and the continued maintenance of these dams, impacts due to dam inundation would be less than significant.

A seiche is typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other. When the wind stops, the water rebounds to the other side of the enclosed area. The water then continues to oscillate back and forth for hours or even days. Earthquakes, tsunamis, or severe storm fronts may also cause seiches along ocean shelves and ocean harbors. The City of Monrovia is located approximately 25 miles east of the Pacific Ocean in the San Gabriel Valley. The proposed project would not be exposed to tsunami hazards due to its inland location (over 25 miles from the nearest ocean) and elevation (over 500 msl). In addition, no large water bodies exist in the City of Monrovia, and no seiche hazards have been identified in the City. In the context of this project site, there is a low likelihood of seiche hazards given the location of the project away from the steep hillsides (the proposed project is roughly 1.5 miles from steep hills). Consequently, no potential for mudflows exists. Therefore, the proposed project would not be subject to seiche hazards, mudlows, or tsunamis; No impact would occur.

e) **Less Than Significant Impact.** With regard to the applicable water quality control plan, see the discussion in subsection a above. Because the project will be required to comply with requirements of the RWQCB, Los Angeles Region, impact would be less than significant.

With regard to groundwater management, the City of Monrovia operates its own water utility, with the primary source of water supply being the Main San Gabriel Groundwater Basin. The basin has a storage capacity of approximately 8.7 million acre-feet (AF). Because the basin provides water for many users and jurisdictions throughout the San Gabriel Valley, the basin is adjudicated to ensure all users pay fair-share costs to import supplemental water sources needed to recharge the basin. No limits are placed on withdrawals. Pursuant to state law, the City has adopted an Urban Water Management Plan (UWMP) to identify water needs in wet and dry years, and to identify ways to conserve water. The current 2015 UWMP projects future water demands up to 7,037 AFY through the year 2040, starting at 6,635 AFY in 2019-2020. The UWMP reflects anticipated development intensity increases within the Station Square area.

The City operates a water conservation program called Monrovia Conserves: A Community Effort. The City also has Drought Regulations and Water Conservation Standards (Ordinance No. 2015-05 and Resolution No. 2015-41) mandated by the 2015 UWMP whereby actions are required to respond to a severe or extended water shortage.

Given that the City's UWMP accounts for anticipated growth within the Station Square area, that adequate water supplies are projected to be available in the future, and the requirement of the proposed project to comply with all City water use reduction regulations, impact would be less than significant.

4.11 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐

a) **No Impact.** The proposed project does not include any modifications to the existing access from the I-210 freeway nor impede access to the adjacent community, as the proposed mixed-use development does not include any modifications to the circulation system or existing roadways of the existing community. Also, the proposed project does not involve construction of any improvement such as a flood control channel, new roadway, or other obstruction that would impede travel in an established community or physically divide the established community. Therefore, no impact would occur.

b) **Less Than Significant Impact.** The General Plan Land Use designation for the project site is Station Square Transit Village. This land use designation establishes very specific land use regulations for several sub-areas within the Station Square Transit Village. The proposed project site lies within Area PD-12 ("PD-12 Development Guidelines"). Developments are required to comply with the general and specific provisions of Area PD-12. In addition, they must conform to the general objectives and urban design objectives of the Station Square Transit Village planning area.

With regard to applicable zoning, Monrovia Municipal Code Section 17.08.010.D states:

> "Properties in the PD zones are subject to the provisions in the Land Use Element of the General Plan. A use not specifically listed in the General Plan as permitted in a PD zone may be approved by the Development Review Committee; provided that the use is not expressly prohibited by the General Plan in that PD zone, and upon the Development Review Committee finding that the use is comparable to the uses permitted in the zone and compatible with adjacent uses. The Development Review Committee may also determine that such a use will require approval of either a minor conditional use permit or major conditional use permit."

Thus, the provisions for Land Use Element Area PD-12 serve as the zoning regulations applicable to the subject property.

The vision for the Station Square Transit Village is to establish a "dynamic, mixed-use, transit-oriented community." [25] To implement this vision and the Land Use Element goals and policies, a draft Specific Plan has been prepared.

The Specific Plan provides for the development of a 310-unit, mixed-use residential and commercial project with public plazas. The applicant has requested a density bonus pursuant to California Government Code Sections 65915-65918 and proposes to provide 25 affordable housing units, with 13 units set aside for very-low-income households and 12 units for moderate-income households. Section 1.9.2 (Affordable Housing Agreement) of the Specific Plan requires that these units remain affordable for at least 55 years.

Pursuant to the State Density Bonus Law, the applicant has requested concessions and waivers of zoning/land use regulations consisting of:

1) one incentive/concession to allow for preparation of a specific plan for a mixed-use project (with residential above the ground floor) in the Western Gateway subarea on a site less than two acres in size (the Land Use Element requires a minimum site size of two acres), and
2) one waiver of development standard to increase the maximum floor-area ratio (FAR) from 2.5 to 3.8.

Pursuant to the State Density Bonus Law, a general plan amendment is not required for these exceptions to the development standards.

Tables 4.11-1 and 4.11-2 present the land use regulations applicable to the project site and indicate how the proposed project complies.

Table 4.11-1
Station Square Transit Village General Plan Land Use Evaluation:
PD-12 and Western Gateway

PD-12 General Provision	Project Conformance
New development shall be designed pursuant to the Planning Objectives outlined in the Land Use Element for the Station Square Transit Village (e.g. architecture, hardscape, landscape).	The proposed specific plan consists of a transit-oriented development with a diverse mix of housing (including deed-restricted affordable housing), unique architecture, public spaces, and space for locally serving commercial businesses.
With the exception of single-family dwellings, the construction of new buildings or additions to existing buildings shall require approval of a conditional use would not be required if the existing building, and the project meets the requirements set forth in the Monrovia Municipal Code.	Project entitlements include approval of a conditional use permit.
Lot consolidation that leaves remnant parcels totaling less than the conforming lot size for the applicable zone shall be discouraged.	The proposed project requires approval of a Vesting Tentative Parcel Map to consolidate seven contiguous lots into one parcel. PD-12 does

[25] Monrovia General Plan, Land Use Element. p. 43.

Table 4.11-1
Station Square Transit Village General Plan Land Use Evaluation:
PD-12 and Western Gateway

PD-12 General Provision	Project Conformance
	not have an applicable minimum lot of sizes, and therefore no nonconforming lots would be created.
Development located adjacent to or facing residential neighborhoods shall be designed to mitigated adverse impacts.	The proposed project is adjacent to MODA, a 300-unit multi-story multi-family residential development southwest of the site. The proposed project mirrors the scale of MODA.
Mixed uses are encouraged (except for development using RL, or RM/RH standards, which shall be solely residential).	The proposed project is a vertical mixed-use development providing 310 apartments above 10,000 square feet of ground-floor commercial space.
In order to encourage the inclusion of affordable residential units, deviations in unit size, recreation space and parking based on the Zoning Ordinance can be considered if at least 15 % of the units are designated for moderate income or 10 % low income or 5 % very low income. Units designated as affordable shall be restricted for a minimum of 55 years,	The proposed specific plan, once adopted, would serve as the zoning regulation for the project site. The specific plan provides for 25 deed-restricted affordable units, which represent 8% of the units, with the 132 very-low-income units representing 4.2% of the total. The units will be deed restricted.
Conversion from nonresidential uses to residential uses or mixed-use development that includes residential uses shall be adjacent to other residential uses.	Residential developments are either constructed or proposed adjacent to the site.
A minimum of two acres is required for a specific plan.	The project site is 1.83 acres in size. The applicant has requested a waiver of this requirement pursuant to State Density Bonus Law, which allows for concessions and waivers if affordable housing units are provided.
Existing legal uses shall be considered conforming, New uses in existing structures and new construction shall be subject to the provisions of the BE Zone.	Not applicable; existing uses will be removed.
Lot consolidation is encouraged.	The proposed project would result in the consolidation of seven lots into a single parcel.
New development shall have its primary orientation toward Myrtle and Pomona Avenue. The maximum building setback along Myrtle Avenue shall be five feet. Parking facilities adjacent to Myrtle are discouraged.	The project site does not front on Myrtle Avenue. Pomona Avenue serves as project's primary street frontage for its ground floor commercial spaces, residential lobby entrance, and public plazas.
High-quality design ("signature architecture") shall be a primary consideration in the approval of new development.	The project is oriented toward the Gold Line station, with a generous public plaza and sidewalk-oriented shop fronts along Pomona and Primrose Avenues. The design creates excitement on all building facades with outdoor spaces. The overall design goal is to invite the

Table 4.11-1
Station Square Transit Village General Plan Land Use Evaluation:
PD-12 and Western Gateway

PD-12 General Provision	Project Conformance
	community to interact. The architecture consists of textured, colorful, and bright facades.
As an incentive to provide underground and/or structured parking as part of new development and increase in FAR to 2.5:1 may be allowed.	The proposed project provides three levels of parking, two of which are located underground. The proposed project has an FAR of 3.8. A concession from the 2.5 limit has been requested pursuant to State Density Bonus Law.
Residential uses (non-ground level) shall be permitted on sites with a minimum size of two acres only as part of a mixed-use development and would require approval of a specific plan.	The project site is 1.83 acres in size. The applicant has requested a waiver of this requirement pursuant to State Density Bonus Law, which allows for concessions and waivers if affordable housing units are provided.

The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project including the general plan, specific plan, or zoning ordinance. With regard to the requirements for a two-acre minimum lot size for specific plan and a 2.5 FAR maximum, the applicant has requested waivers and concessions pursuant to State Density Bonus Law. Therefore, the proposed project would have a less than significant impact.

4.12 – Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, Specific Plan or other land use plan?	☐	☐	☐	☑

a-b) **No Impact.** The project site is located in a developed area. According to the General Plan Conservation Element, the project site does not contain any known mineral deposits. The proposed project would not 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. There are no mineral resource extractions and or mining operations occurring in the vicinity. In addition, the City of Monrovia zoning precludes mining from occurring at the project site. Therefore, no impact would occur.

4.13 – Noise

Would the project result in:

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

Analysis of noise impacts are based upon the *Monrovia TOD Apartments Environmental Noise Assessment Report* prepared by SSA Acoustics dated November 26, 2018 (Appendix G). This section summarizes the results of the assessment. Refer to the noise study for descriptions of noise metrics and general information about noise and its health effects.

a) **Less Than Significant Impact with Mitigation Incorporated.** Noise is often defined as unwanted sound. Sound is easily measured with instruments, but the human variability in subjective and physical responses to sound complicates the understanding of its impact on people. The *Monrovia TOD Apartments Environmental Noise Assessment Report* assessed the proposed project's noise impact using the criteria established in the General Plan Noise Element and Chapter 9.44 (Noise) of the Monrovia Municipal Code (MMC).

The Noise Element sets forth land use/noise compatibility criteria for the purpose of assessing the appropriateness of establishing particular land uses in noise intensive environments. Multifamily residential uses are identified as "conditionally acceptable" in a 60 to 70 CNEL noise environment and "normally unacceptable" in a 70 to 75 CNEL noise environment unless noise reduction and installation are incorporated into project design.

MMC Chapter 9.44 establishes allowable noise standards for residential uses, indicating that noise levels on residential properties shall not exceed 55 dBA between 7:00 AM and 9:00 PM, and 50

dBA between 9:00 PM and 7:00 AM. Very short-term increase are permitted for bursts of noise. Specifically exempted from the standards are:

The handling of boxes, crates, containers, garbage cans or other similar objects between the hours of 7:00 AM. and 7:00 PM

The operation of any mechanically powered saw, sander, drill, grinder, lawn or garden tool or similar tool between 7:00 AM. and 7:00 PM on weekdays and the hours of 10:00 AM. and 10:00 PM on weekends and holidays

Construction or demolition work conducted between the hours of 7:00 AM. and 7:00 PM on weekdays

Existing Noise Conditions

The primary source of noise exposure to the project site is from the I-210 freeway running east and west immediately north of the site, and from South Myrtle Avenue, which runs north and south to the east. The site is also bordered by West Evergreen Avenue to the north, West Pomona Avenue to the south, and South Primrose Avenue to the west. These roads present a less significant source of the noise to the site. Other sources include commercial activity from the Chevron gas station which borders the east site boundary. There is a railroad for Metro Gold Line light rail transit system approximately 480 feet south of the site; however, this is not a significant noise source to the project site, given that these light rail cars are much quieter than typical trains.

Short-term (ST) measurements were taken to obtain spectral noise data near various areas of the proposed façade. This data is used when designing façade elements such as windows and wall assemblies. The measurements have been summarized in Table 4.13-1. Hourly averages can be seen in the measurement charts located in Appendix II of the Environmental Noise Assessment. Short-term and long-term points are shown in Figure 11 Noise Measurements Location Map.

Table 4.13-1
Short-term Measurement Results

Location	dBA	Time	Duration	Date	Measurement Description
ST-1	67.8	9:35 AM	5 min	6/11/2018	Primary noise from I-210 Freeway. 10 cars passed on West Evergreen Avenue. Reduced speed from traffic signal stopping cars most of the time.
ST-2	64.6	9:43 AM	5 min	6/11/2018	72 cars passing and 12 medium sized trucks at an average speed of 25 mph, at a distance of 186 feet from the first lane of traffic on South Myrtle Avenue.
ST-3	59	9:50 AM	5 min	6/11/2018	6 cars passing at an average speed of 20 mph, at a distance of 14 feet from the first lane of traffic on West Pomona Avenue.
ST-4	59.3	9:58 AM	5 min	6/11/2018	4 cars passing at an average speed of 20 mph at a distance of 14 feet from the first lane of traffic on South Primrose Avenue.

Figure 11: Noise Measurements Location Map

Long-term (LT) noise measurements were conducted at the site from Monday, June 11, 2018 to Wednesday June 13, 2018, as summarized in Table 4.13-2. These measurements were used to calculate the Community Noise Exposure Level (CNEL), which is a descriptor used to calculate the average hourly noise levels over a 24-hour period, with a 5-dBA penalty between the evening hours of 7:00 PM and 10:00 PM and a 10-dBA penalty between the nighttime hours of 10:00 PM and 7:00 AM. The LT-2 CNEL was predicted to be 5 points higher for the residential levels above ground level from increased exposure to I-210 Freeway. The predicted noise exposure at LT-1 is a CNEL 75.

Table 4.13-2
Long-term Measurement Results

Location	dBA	Time	Duration	Date	Measurement Description
ST-1	67.8	9:35 AM	5 min	6/11/2018	Primary noise from I-210 Freeway. 10 cars passed on West Evergreen Avenue. Reduced speed from traffic signal stopping cars most of the time.
ST-2	64.6	9:43 AM	5 min	6/11/2018	72 cars passing and 12 medium sized trucks at an average speed of 25 mph, at a distance of 186 feet from the first lane of traffic on South Myrtle Avenue.
ST-3	59	9:50 AM	5 min	6/11/2018	6 cars passing at an average speed of 20 mph, at a distance of 14 feet from the first lane of traffic on West Pomona Avenue.
ST-4	59.3	9:58 AM	5 min	6/11/2018	4 cars passing at an average speed of 20 mph at a distance of 14 feet from the first lane of traffic on South Primrose Avenue.

The nearest sensitive use affected by the proposed project is the single-family residence to the west, at approximately 290 feet from the center of the site, 100 feet from the nearest site boundary, and 500 feet from the farthest site boundary. These increased distances beyond 50 feet would provide approximately 6 dBA of reduction from nearest point on the site and 20 dBA of reduction from the farthest point on the site, given that attenuation increases by 6 dBA for every doubling of distance.

Noise and Land Use Compatibility
Based on the measurement results and calculations, the maximum noise exposure to the project site would be a CNEL 75 from the I-210 freeway, which would fall into the normally unacceptable range for a new multi-family residential construction and development, based on the General Plan. Therefore, specific building construction methods would be required to reduce noise levels.

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

Interior noise level analysis has been provided in Appendix G. In order for the interior noise levels to achieve a CNEL 45, the building envelope must provide at least 30 dB of noise reduction at the north facade. This would require an improved building envelope. Per Title 24 regulations cited above, project design and construction approaches must ensure that interior noise levels of CNEL 45 can be achieved. Compliance with mitigation measure NOI-1 and existing building code requirements would reduce

impacts to a less than significant level.

The proposed project includes a central courtyard as the primary exterior area serving the residents of the building. Exterior noise levels to the central courtyard would be shielded by the building, which wraps around the courtyard. The predicted noise within the courtyard was estimated to be CNEL 60 or lower from, primarily from I-210 and South Myrtle Avenue. Thus, the impact would be less than significant.

Project-Generated Traffic Noise
LLG completed a traffic study for the proposed project in November 2018 and provided traffic volume estimates for 11 different intersections in close proximity to the proposed project site. The West Pomona Avenue and South Myrtle Avenue intersection was predicted to be the most impacted. The traffic data utilized for the noise assessment identified 1,441 peak hour trips in the AM and 1,845 peak hour trips in the PM. The existing with project traffic volumes would increase the count to 1,465 peak hour trips in the AM and 1,911 peak hour trips in the PM. The traffic volumes are estimated to increase traffic noise by less than 1 dBA CNEL. Per the General Plan, project-generated traffic noise is considered a significant impact if it increases the site CNEL levels by 3 dBA. Therefore, the increase in noise due to project generated traffic is considered a less than significant impact on sensitive receivers.

Operational Noise
The predominant operational noise sources likely to emanate from the proposed project to the surrounding neighborhood include the pool and courtyard, sky decks, and potentially the retail spaces. Other sources would include outdoor (heating, ventilation, and air-conditioning) equipment or ductwork serving the building that is exhausted to the exterior.

Sensitive receivers include the apartment building to the southwest of the site and the single-family residence to the west of the site along West Evergreen Avenue. Ambient noise from I-210 is predicted to be 63 dBA during nighttime hours and 66 dBA during daytime hours, which would generally dominate over any new noise sources generated by commercial or residential uses associated with the proposed project. Thus, impacts would be less than significant.

Construction Impacts
Construction noise is predicted based on the typical noise levels for various types of construction activity for domestic housing projects, as provided by the U.S. Environmental Protection Agency and presented in Table 3 in the noise study. Construction activity on the site is estimated to start in 2020 and last 26 months. Construction hours generally would occur Monday through Friday, between 7:00 AM and 7:00 PM. However, some Saturday construction could be expected. On Saturdays, construction activity is not exempted from the City's noise regulations.

Noise to West Sensitive Receiver
The single-family residences to the west are approximately 115 feet from the nearest site boundary and 480 feet from the farthest boundary. These increased distances beyond 50 feet will provide approximately 7 dBA of reduction from nearest point on the site and 20 dBA of reduction from the farthest point on the site, given that attenuation increases by 6 dBA for every doubling of distance. Therefore, construction noise will range between 61 dBA and 81 dBA throughout the construction process, depending on what equipment is being used and on what portion of the site. The ambient noise levels at this receiver are estimated to be 66 dBA during construction hours, based on data collected for the short-term and long-term noise measurements. Construction noise is predicted to exceed 60 dBA, above the 55 dBA standard for residential neighborhoods and above the ambient by 5 dBA. If construction activity occurs outside of exempted hours or on Saturday, impact would be considered significant.

Noise to Southwest Sensitive Receiver
The multifamily residential building southwest of the project site is 100 feet from the nearest site boundary and 500 feet from the farthest site boundary. These increased distances beyond 50 feet will provide approximately 6 dBA of reduction from nearest point on the site and 20 dBA of reduction from the farthest point on the site. Therefore, construction noise will range between 61 dBA and 82 dBA throughout the construction process, depending on what equipment is being used and on what part of the site. The ambient noise levels at this receiver are estimated to be 59 dBA during construction hours, based on short-term noise measurements. Construction noise is predicted to exceed 60 dBA above the 55 dBA standard for residential neighborhoods and above the ambient by 5 dBA. If construction activity occurs outside of exempted hours or on Saturday, impact would be considered significant.

Mitigation measure NOI-2 defines the noise barrier required to reduce line-of-sight noise to sensitive receptors, with the ability to reduce noise levels by at least 5 dB.[26] The noise barrier would reduce noise at ground level during the duration of construction activity at least to existing ambient levels. Implementation of mitigation measures NOI-2 and NOI-3 would lessen the impacts of construction noise to sensitive receivers to less than significant.

Mitigation Measures

MM NOI-1: Confirm Compliance with Applicable Interior Noise Standard Requirements. Prior to the issuance of a building permit, the City shall review and approve an acoustical analysis, prepared by or on behalf of the Project Applicant, and based on the final Project design, that:

1) Identifies the exterior noise levels at the:
    a. Exterior building facades that face West Evergreen Avenue/I-210, South Primrose Avenue, and South Myrtle Avenue; and
    b. Exterior recreation areas, including patios, that face and have a line of sight to West Evergreen Avenue/I-210, South Primrose Avenue, and South Myrtle Avenue.
2) Identifies the final site and building design features that would attenuate exterior building façade noise levels to interior levels that do not exceed 45 CNEL in habitable rooms and 50 dBA Leq (1-hour) in other occupied rooms. Potential noise insulation site and building design features capable of achieving this requirement may include, but are not limited to:
    - Sound barriers
    - Enhanced exterior wall construction/noise insulation design
    - Use of enhanced window, door, and roof assemblies with above average sound transmission class (STC) or outdoor/indoor transmission class (OITC) values
    - Use of mechanical, forced air ventilation systems to permit a windows-closed condition in residential units.

Requirements and Timing: An acoustical report shall be submitted to City Planning for review and approval prior to final sign off on construction, documenting that actual interior and exterior noise level at the locations indicated in this measure, meet City and State standards. **Monitoring:** City staff shall approve the acoustical analysis prior to sign off of final construction.

[26] Harris, Cyril M., *Acoustical Measurements and Noise Control* – Third Edition, 1991. Barrier Attenuation - Point Source, p. 3.19.

MM NOI-2: Construction Noise. Prior to the start of construction, the applicant/developer shall install a minimum eight-foot- tall noise barrier along the western and southwest frontage of the project site to reduce line-of-sight noise to sensitive receivers adjacent to the site (see Figure 12). The noise barrier shall consist of the following:

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

These requirements can be adjusted by the City to achieve the noise reduction required to ensure compliance with Monrovia Municipal Code Chapter 9.44 (Noise). An acoustical study prepared by an acoustical engineer shall be provided to document that the barrier will achieve the standards.

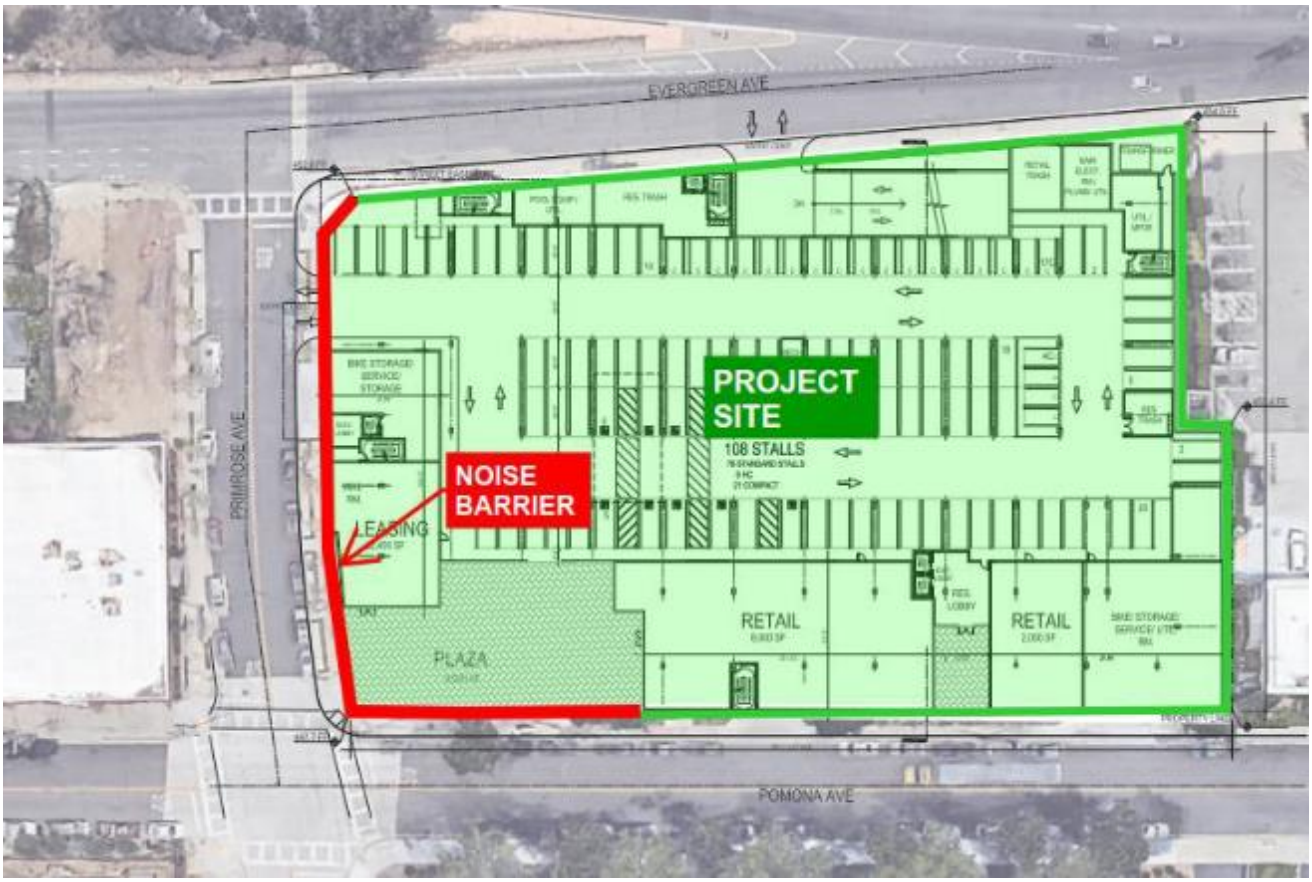

Figure 12: Noise Barrier Location

MM NOI-3: To reduce temporary construction noise impacts on adjacent land uses, the applicant or the applicant's construction contractor shall implement the following construction-period noise abatement measures:

- *Mufflers.* All construction equipment shall be equipped with muffles and other suitable noise attenuation devices
- *Equipment Selection*. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), to the maximum extent feasible.
- *Notification.* All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule for the proposed Project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can enquire about the construction process and register complaints.
- *Noise Disturbance Coordinator.* 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 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.
- *Construction Traffic.* Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.

Requirements and Timing: The developer shall provide the City with a construction management plan that addresses all of the above. **Monitoring:** City staff shall approve the construction management plan prior to the issuance of building permits. The Building Official or designee shall be responsible for responding to any complaints.

b) **Less than Significant Impact.** The State of California Department of Transportation recommends a vibration limit of no more than 0.5 in/sec PPV for modern and structurally sound buildings, 0.3 in/sec PPV for structurally sound buildings where damage may be a concern, and 0.08 in/sec PPV for ancient or structurally weakened buildings adjacent to the project site. Per the significance criteria, ground vibration levels exceeding 0.3 in/sec PPV would result in a significant impact. Vibration levels from construction activity would occasionally be perceptible at neighboring properties during daytime hours.

Construction activities would include demolition, excavation, site preparation, foundation work, concrete pouring, framing, and finishing. The most significant sources of vibration during construction are from pile driving equipment; however, the proposed project would not be using this type of equipment. Most other equipment is around 0.2 in/sec PPV or less at a distance of 25 feet. All adjacent buildings are at least 50 feet or more from the site, with the exception of the Chevron Food Mart to the east. This may result in perceptible vibration levels at this receiver for a short duration of time. This is a modern building and should not be at risk for damage from vibration. Thus, the proposed project would not exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. Therefore, impacts would be less than significant.

c) **No Impact.** The proposed project would not be 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. The proposed project would not be located within the vicinity of a private airstrip; therefore, the project would not expose people residing or working in the project site to excessive noise levels. Therefore, no impact would occur.

4.14 – Population and Housing

Would the project:

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

a) **Less Than Significant Impact.** The proposed project includes new housing and commercial space that would result in direct population growth. Table 4.14-1 below identifies the potential increase in population associated with the planned 310 units.

Table 4.14-1:
Estimated Project Population

Proposed Unit Size	Unit Quantity	Person per Household	New Residents
Studio	67	1.536	103
1 Bedroom	182	1.536	280
2 Bedroom	61	3.072	187
Total	**310**	**--**	**570**

Source: U.S. Census Bureau 2018
*According to the U.S. Census Bureau, the average persons per bedroom in Monrovia are 1.536.

The General Plan Proposed Land Use and Circulation Element EIR (EIR) used a baseline population of 39,147. In 2017, the U.S. Census Bureau estimated population of Monrovia was 37,061 with 13,727 total housing units. The EIR analyzed the Land Use Element's planned 3,895 dwelling units within three focus areas (South Myrtle Avenue, West Huntington Drive, and Station Square Transit Village), with 3,600 planned in Station Square Transit Village. These dwelling units would result in 10,114

residents at planned buildout in 2035. Combined with natural growth rate, the EIR forecasted that Monrovia's population would reach 58,805 persons in 2035.[27]

Southern California Association of Governments (SCAG) population forecast for Monrovia is 40,300 in the most recent adopted Regional Transportation Plan (2016-2040 RTP/SCS). SCAG's growth forecast uses a variety of existing socio-economic and demographic factors, including fertility, mortality, migration, labor force, housing units, and local policies and land use plans.[28]. However, this is not planned population growth. The proposed project's contribution to population increase is significantly below the planned population growth of the Land Use Element and well-within the analysis set forth the in EIR; therefore, the proposed project's impact would be less than significant.

Employment
The project would produce a short-term increase in construction jobs during project construction. It is anticipated that workers would be drawn from the regional pool of construction workers that extends to the Inland Empire. This impact would be less than significant and short term.

According to the SCAG 2016-2040 RTP/SCS, employment in the City of Monrovia is projected to increase by 3,600 jobs between 2012 and 2040. The proposed development would include 10,000 square feet of retail and service businesses that would create new job opportunities in Monrovia. Also, onsite managers, groundskeepers, and other maintenance workers would be employed for the apartments. According to the U.S. Department of Energy 2012 Commercial Buildings Energy Consumption Survey[29], the average employee to commercial floor space is one employee per 550 feet of retail space as identified by the U.S. Green Building Council and San Diego Association of Governments.[30] Therefore, approximately 18 new jobs would be created for the commercial space. According to the project applicant, the apartments would employ approximately 25 persons. This would result in a total of 43 new positions associated with the proposed project. These 43 new positions represent less than one percent of projected of the 3,600 local jobs growth. The proposed project would therefore not produce significant employment growth. Thus, population and employment growth impacts would be less than significant.

b) **No Impact.** No residential structures exist on the project site. No persons or groups of persons would be forced or obliged to leave their homes as a result of implementation of the proposed project. Therefore, the proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

[27] City of Monrovia, Final EIR, Monrovia General Plan Proposed Land Use and Circulation Elements, p. 2-16, Table 2-1 Existing and Future Project Development
[28] http://rtpscs.scag.ca.gov/Pages/default.aspx
[29] https://www.eia.gov/consumption/commercial/reports/
[30] https://www.usgbc.org/drupal/legacy/usgbc/docs/Archive/General/Docs4111.pdf

4.15 – Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

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

a) **Less Than Significant Impact.** the City of Monrovia is an Area "C" region, as classified by the Regional Office of Emergency Service System. An Area C region shares resources with the other departments located in the San Gabriel Valley. The City of Monrovia Fire and Rescue Department (Fire Department) is the primary fire protection provider for the City. Fire protection agreements with the City of Arcadia and the Los Angeles County Fire Department provide for additional resources for the City of Monrovia.

Monrovia has two fire stations:

- Fire Station 101 located at 141 East Lemon Avenue, approximately one-mile northeast of the project site
- Fire Station 102 located at 2055 South Myrtle Avenue, approximately 0.5 miles to the south of the project site

The proximity of Fire Station 102 ensures response times would be less than five minutes. Given the proximity of the fire stations to the project site, the proposed project would not require the construction of new fire stations. No uses are proposed on the project site that pose a significant fire risk. Section 2.8.4 (Public Services) describes fire safety requirements that will be enforced through conditions of approval, including fire sprinkles, smoke and carbon monoxide alarms, fire hydrant locations, and emergency access to the site and within the building.

Per discussion with Fire Station 102 on January 3, 2019 the existing fire stations have the capacity to accommodate the fire station resources for the projected 570 new residents. Therefore, the proposed project would not require the physical alteration of existing structures to accommodate the development. According to the Fire Department, local response times would not be impacted by the proposed project's increase in 570 new residents. In addition, the City has identified water system improvements in the vicinity of the project site necessary to ensure adequate fire flow, head loss, and pressure to the City's

water system in the Mountain Zone which includes the project site. New water meters and fire flow connections would be provided by the Public Works Department. Water line upgrades are required to serve the proposed project. The City has identified two water system improvements, a booster pump and upgrade of 980 feet of water pipe from 8-inch to 12-inch, that are necessary to ensure adequate fire flow, head loss, and pressure to the City's water system in the Mountain Zone, which includes the project site. A 12-inch line pipe would be installed at the time of building permit. If the pipe is not installed at the time of building permit the proposed project would guarantee the improvement by way of contributing to the fair share payment program.

The project site itself is not located in an area of high fire threat and can be served by the existing fire facilities and services. Thus, the proposed project would not impose significant fire resource requirements on the Fire Department. Therefore, the proposed project would have a less than significant impact.

The proposed project is subject to the requirements of MMC Chapter 3.21 Fire Services Impact fee. Chapter 3.21 is intended to require developers and builders to contribute their proportionate share of revenues necessary to accommodate the impacts having a rational nexus to the proposed building, development or addition, and for which the need is reasonably attributable to the proposed building, development or addition.

The Fire Services Impact Fee (included as Standard Condition SC PS-1) are required on new construction, including additions, new buildings, demolitions and re-build (except as exempted) within the city. Pursuant to the Chapter's requirements, the proposed project would fund the new capital and equipment needs of the Fire Department in order to meet service and facilities demands it generates. The chapter identifies higher impact fees specifically for new industrial buildings, new buildings or additions in the hillside areas and/or in very high fire hazard severity zone. The impact fee will provide for new equipment, facilities and apparatus in order to meet the service demands created by new development. Thus, the proposed project would be less than significant impact.

Standard Conditions

SC PS-1: Prior to the issuance of building permits, the project applicant shall pay a fire impact fee, as required by Municipal Code Section 3.46.040, Schedule of Fees and Service Charges. This fee shall either be paid directly to the City or be incorporated into the overall Communities Facilities District (CFD) fee to be paid by the applicant, as established through negotiations with the City of Monrovia and to the satisfaction of the City.
Requirement and Timing: Development impact fees shall be paid prior to issuance of building permits.
Monitoring: City staff shall confirm payment of development impact fees prior to issuance of building permits.

b) **Less Than Significant Impact.** The Monrovia Police Department provides police services to the residents of Monrovia. The police headquarters building is located at 140 East Lime Avenue, approximately 1.2 miles north of the project site. The Police Department average response time is approximately four minutes. All calls for police service would be handled from the police headquarters facility. The Police Department has not indicated a need for new facilities to serve the proposed project.

As part of the project conditions of approval (included as Standard Condition SC PS-2), a Site Security Management Plan would be submitted for approval by the Chief of Police. The plan would incorporate features such as lighting, gating, and recorded video surveillance within all public open space areas, and parking areas. The proposed project would not create an increase in potential safety concerns, as

the mixed-use development does not propose any uses requiring unique police patrol services. Therefore, the proposed project's impacts would be less than significant.

Standard Conditions

SC PS-2: Prior to the issuance of building permits, the project applicant shall submit a Site Security Management Plan for review and approval by the Monrovia Chief of Police.
Requirement and Timing: Plan approval prior to issuance of building permits. **Monitoring:** City staff shall confirm the Site Security Management Plan approval prior to issuance of building permits.

c) **Less Than Significant Impact.** The proposed project lies within the service area of the Monrovia Unified School District (MUSD). The MUSD operates one pre-school, five elementary schools, two middles schools, one traditional high school, and one alternative high school.

It is anticipated that school-age children residing in the proposed project would attend Broadoaks Elementary School, Santa Fe Middle School, and Monrovia High School. While the MUSD was not forthcoming with 2019 enrollment data, information provided by MUSD in early 2018 indicated that schools at all levels are operating well below capacity.[31]

Although the proposed project could increase the school-age children population that might enroll in the MUSD, the provisions of Leroy F. Greene School Facilities Act of 1998 (SB 50) are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law. As provided in California Government Code Section 65996, the payment of such fees is deemed to fully mitigate the impacts of new development on school services (included as Standard Condition SC PS-4). Thus, the proposed project would have a less than significant impact.

Standard Conditions

SC PS-3: Prior to the issuance of building permits, the project applicant shall pay school facility development impact fees to the Monrovia Unified School District. Proof of payment shall be provided to the City of Monrovia.
Requirement and Timing: Development impact fees shall be paid prior to issuance of building permits.
Monitoring: City staff shall confirm payment of development impact fees prior to issuance of building permits.

d) **Less Than Significant Impact.** The project includes 310 residential dwelling units that could result in the addition of new residents who would incrementally increase the need for local and regional recreation facilities.

The proposed project includes more than 45,000 square feet of private and common recreation areas including a courtyard with a pool, recreation rooms, and three sky decks on the seventh level. The proposed specific plan requires these spaces to be provided for the residents' recreation purposes. In addition, approximately 7,000 square feet of public plazas will be provided along the project's street frontages. These substantial provisions for recreational areas allow the reduction in the potential

[31] City of Monrovia. Initial Study/Mitigated Negative Declaration for the Avalon Monrovia Specific Plan. July 2018. p. 82.

demand on existing public recreational facilities. The need for parks and recreational facilities to serve the proposed project are further offset by use agreements between the City and local schools that provide additional, after-school recreation opportunities.

The Citywide Park Master Plan identifies a target ratio of 1.1 acres of parkland per 1,000 people. The City of Monrovia has a current ratio of 0.9 acres of urban park per 1,000 people. However, the Park Master Plan state that such metrics "…do not provide adequate recognition of the quality of the facilities or their distribution." The Park Master Plan assesses adequate parkland provision based on residents' access to facilities via walking. The Station Square area is identified as an area with good access to park facilities.[32]

The City of Monrovia provides for parkland acquisitions via MMC Chapter 3.32 (Dwelling Unit Tax) and MMC Chapter 3.41 (Special Open Space Tax), as stated in the Open Space Element and the Parks Master Plan. This is a standard requirement for new development. This funding mechanism was implemented for funding acquisition of these lands for permanent open space, as well as revenue for future maintenance of open space. The imposition of this funding mechanism, together with the proposed project's private recreational areas, would offset incremental impacts. Therefore, impacts would be less than significant.

e) **Less than Significant Impact.** The Public Library Division operates the Monrovia Public Library located on Myrtle Avenue and Lime Avenue. It is the City's only public library and was substantially reconstructed in 2009. Funding for the reconstruction is through a special tax established in MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax). The proposed project would not result in the construction of new library service facilities (or physically alter existing) structures that could result in environmental impacts. Therefore, impacts would be less than significant.

[32] City of Monrovia Citywide Park Master Plan. March 2018. p. 35

4.16 – Recreation

Would the project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☑	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

a) **Less Than Significant Impact.** The proposed project would not accelerate the substantial physical deterioration of any park or recreational facility. Project residents would have more than 45,000 square feet of private and common recreation areas, including courtyard with a pool, recreation rooms, and three sky decks on the 7th level. In addition, the proposed project incorporates approximate 7,000 square feet of public plazas on the ground-floor and integrated into adjacent streetscape. Section 2.7.4 of the proposed specific plan requires these spaces to be provided for the residents' recreation purposes. In addition to the eight parks and recreation facilities that serve the urban areas of Monrovia totaling 33.3 acres, the Open Space Element includes mention of the Hillside Wilderness Reserve and Canyon Park as regional facilities totaling 1,416 acres, and both have recreational components.

Approximately 2.5 acres of parks have recently opened are within 0.5-mile or 10-minute walking distance of the project site. A block from the site is the 1.7-acre Station Square Park, which opened in 2016, and its physical condition is the highest rated among the City's parks.[33] Its recreational facilities include playground, pathways/trails, and performance stage. Approximately 0.5 mile east is the 0.78-acre Evergreen Park, and a recreational element is identified in the Parks Master Plan. Evergreen Plaza is intended to a public plaza viewing area, designed for public observation of train activities at the Gold Line Operations Campus. The plaza is a passive open space landscaped with ornamental shade trees, natural boulders found on the campus site, benches, and picnic tables.[34]

[33] P. 11, Citywide Parks Master Plan. Condition of Existing Parks. Survey respondents were asked to rate the general condition (maintenance and upkeep) of City parks that they had visited. Canyon Park and Station Square Park received the highest ratings for condition with 94% of 392 respondents and 93% of 204 respondents who visited in the past year rating the condition as 'excellent', respectively

[34] City of Monrovia, City Council Agenda Report AR-4, July 7, 2015

The Citywide Parks Master Plan discusses future potential park acquisitions to provide parks in neighborhoods currently underserved. Underserved communities are defined by the Los Angeles County Needs Assessment, which identified in a 2016 Los Angeles County Parks mapping project that residents should be within a ½ mile of a park. Financing and funding of the City's park and recreation system is via MMC Chapter 3.32 (Dwelling Unit Tax) and MMC Chapter 3.41 (Special Open Space Tax), as stated in the Open Space Element and the Parks Master Plan. These taxes are paid by the property owner of the project site to improve and to expand public parks and recreational facilities and to fund the acquisition and maintenance of open space and recreational land. The City does not collect park impact fees to fund new parkland acquisition or existing park maintenance. The Parks Master Plan's future park acquisition strategies do not include developer impact fees, and to equitably distribute resources to the park-poor neighborhoods identified in its Parkland Gap Analysis [35], excludes constructing a third public park in Station Square. In addition, the City would require the developer to pay park fees as part of a Community Facilities District (CFD) formed to fund public services and facilities. Therefore, impacts would be less than significant.

b) **Less Than Significant Impact.** The proposed project includes private recreational facilities for use by occupants. No expansion of public recreational facilities would occur. The proposed project includes onsite recreational amenities, including a gym. The proposed project does not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As such, impacts would be less than significant.

[35] pp. 34 and 35. Citywide Parks Master Plan, "Parkland Gap Analysis"

4.17 – Transportation

Would the project:

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

a) **Less than Significant Impact.** A traffic impact study was conducted by Linscott Law & Greenspan Engineers dated March 22, 2019 (Appendix H) for the proposed project. A summary of the traffic impact findings can be found below.

Study Area Intersections
Eleven intersections were studied for weekday morning and afternoon peak hour conditions as follows:

1. Magnolia Avenue/Central Avenue (stop-sign controlled)
2. Magnolia Avenue/Evergreen Avenue (stop-sign controlled)
3. Magnolia Avenue/Duarte Road (signalized)
4. Myrtle Avenue/Huntington Drive (signalized)
5. Myrtle Avenue/Central Avenue (signalized)
6. Myrtle Avenue/Evergreen Avenue (signalized)
7. Myrtle Avenue/Pomona Avenue (signalized)
8. Myrtle Avenue/Duarte Road (signalized)
9. California Avenue/Central Avenue (signalized)
10. California Avenue/Evergreen Avenue (signalized)
11. California Avenue/Duarte Road (signalized)

The traffic analysis provides an evaluation of study area intersections for the following scenarios:

- Existing Conditions (Year 2018)
- Existing Conditions with Project (Year 2018 plus Project)
- Future (Year 2022)
- Future with Project (Year 2022 with Project)

Traffic Counts

Manual counts of vehicular turning movements were conducted at the 11 study intersections during the weekday morning and afternoon commuter periods to determine the peak hour traffic volumes. Manual counts were conducted in 2016, 2017, and 2018 at the study intersections from 7:00 AM to 9:00 AM to determine the AM peak commuter hour, and from 4:00 PM to 6:00 PM to determine the PM peak commuter hour. In conjunction with the manual turning movement vehicle counts, a count of bicycle and pedestrian volumes were collected during the peak periods. All traffic counts were conducted when local schools were in regular session.

Circulation

The City of Monrovia has four categories in its roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. Primary regional access is provided by the I-210 Freeway. I-210 Freeway connects the foothill communities from the westerly terminus in Los Angeles community of Sylmar to the easterly terminus in the City of Redlands. In the project vicinity, four mixed-flow mainline lanes and one High Occupancy Vehicle lane are provided in each direction. Full access interchanges are provided at Myrtle Avenue. Public bus and rail transit services are provided by Foothill Transit and Metro. The Metro Gold Line Monrovia station is located one block south of the project site, at 1675 South Primrose Avenue.

Cumulative Traffic Impacts

A forecast of on-street traffic conditions prior to occupancy of the proposed project was prepared by incorporating the potential trips associated with other known development projects in the area. With this information, the potential impact of the proposed project can be evaluated within the context of the cumulative impact of all ongoing development. The traffic impact study analyzed the impacts to traffic, circulation, congestion management plans, and cumulative effects of the proposed project.

Trip Generation

Traffic volumes expected to be generated by the proposed project during the weekday AM and PM peak hours, as well as daily, were estimated using rates published in the 10th Edition of the ITE Trip Generation Manual. In addition, a transit adjustment factor of 25 percent was conservatively applied to the residential traffic generation forecast, and a transit adjustment factor of 15 percent was applied to the retail traffic generation forecast after the internal/pass-by adjustments were applied. The proposed project is expected to generate 73 net new vehicle trips (11 inbound trips and 62 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the proposed project is expected to generate 111 net new vehicle trips (71 inbound trips and 40 outbound trips). According to the traffic study, over a 24-hour period the proposed project is forecast to generate 1,390 net new daily trip ends during a typical weekday (approximately 695 inbound trips and 695 outbound trips). As identified in the traffic study, the relative impact of the added project traffic volumes to be generated by the proposed project during the weekday AM and PM peak hours was evaluated based on analysis of existing and future operating conditions at the study intersections, without and with the proposed project. The residential and retail project traffic volume distribution percentages during the weekday AM and PM peak hours at the study intersection are illustrated in Figures 14 and 15.

Level of Service

For signalized intersections, the City use the LOS metric. The City of Monrovia does not have established thresholds of significance for unsignalized intersections. The traffic study therefore assumed that study intersections operating at a LOS E or F conditions for future with project conditions would require preparation of a traffic signal warrant analysis at the subject intersection, and a threshold of LOS D would be considered below operating standards. The traffic study considered the City's traffic study guidelines for LOS calculations. The overall intersection v/c ratio is subsequently assigned a LOS value to describe intersection operations. Level of service varies from LOS A (free flow) to LOS F

(jammed condition). In Appendix H Table 8-1 details level of service criteria and Table 8-2 details level of service criteria for unsignalized intersections. The six qualitative categories of LOS are defined along with the corresponding ICU value range in Table 9-1 of the Traffic Impact Analysis (Appendix H).

Existing Conditions

As indicated in column 1 of Table 4.17-1, all 11 study intersections are presently operating at LOS D or better during the weekday AM and PM peak hours. In Appendix H, Figures 9-1 and 9-2 illustrate the project traffic volumes at the study intersections during the weekday AM and PM peak hours. As shown in Appendix H column 2 of Table 10-1 in Appendix H and Table 4.17-1, application of the City of Monrovia's threshold criteria to the "Existing With Project" scenario indicates that the proposed project is not expected to result in a significant traffic impact at any of the study intersections during the weekday morning or afternoon peak hours. Incremental but not significant impacts are noted at the remaining study intersections.

Future Conditions

The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects (Table 4.17-2), as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). In Appendix H, Figures 9-3 and 9-4 illustrate the future without the project traffic volumes at the study intersections during the weekday AM and PM peak hours. The v/c ratios and delay at all the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed in Appendix H Table 7-1 and shown below in Table 4.17-1.

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Figure 13:
Project Trip Distribution (Residential Component)

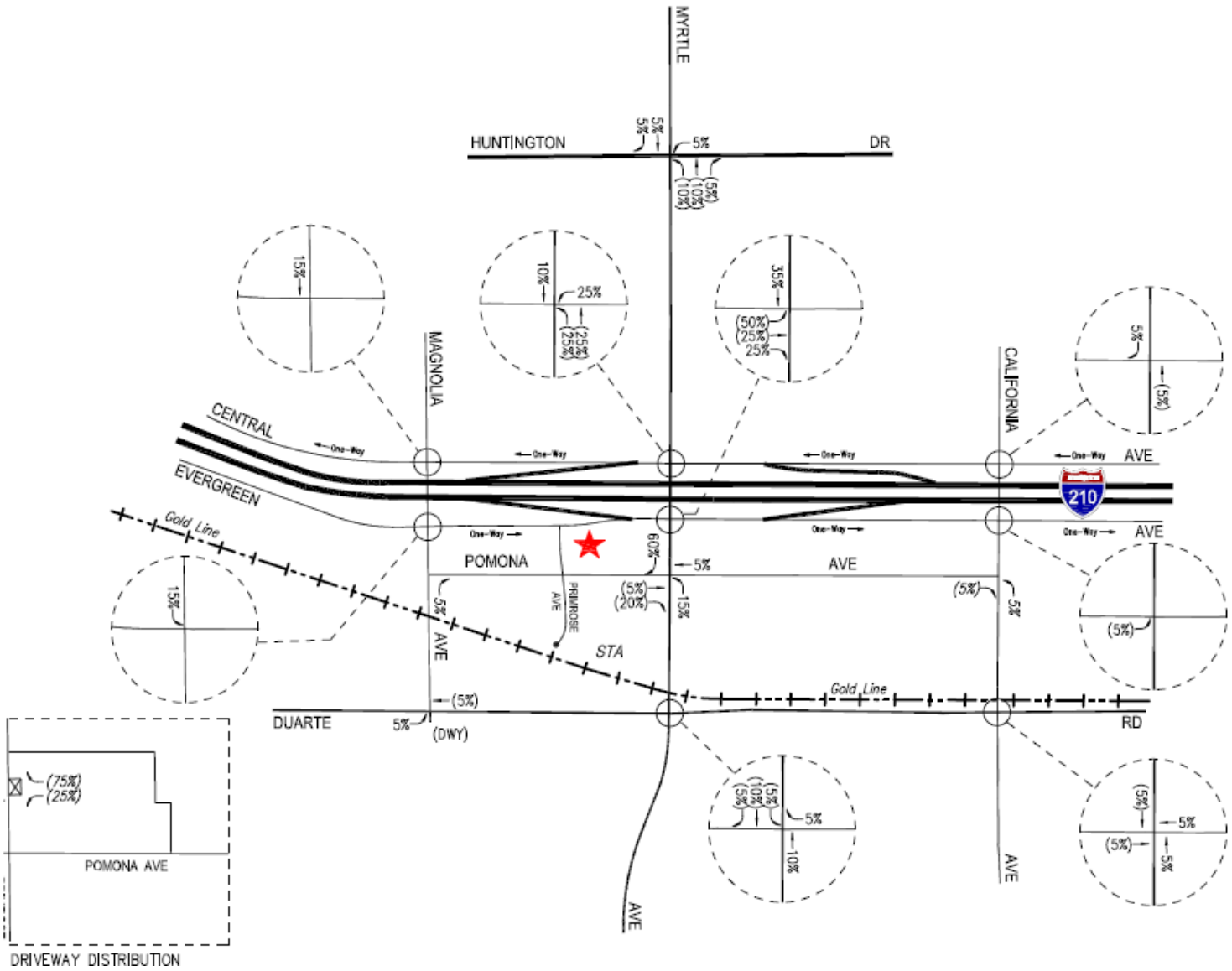


Figure 14
Project Trip Distribution (Retail Component)

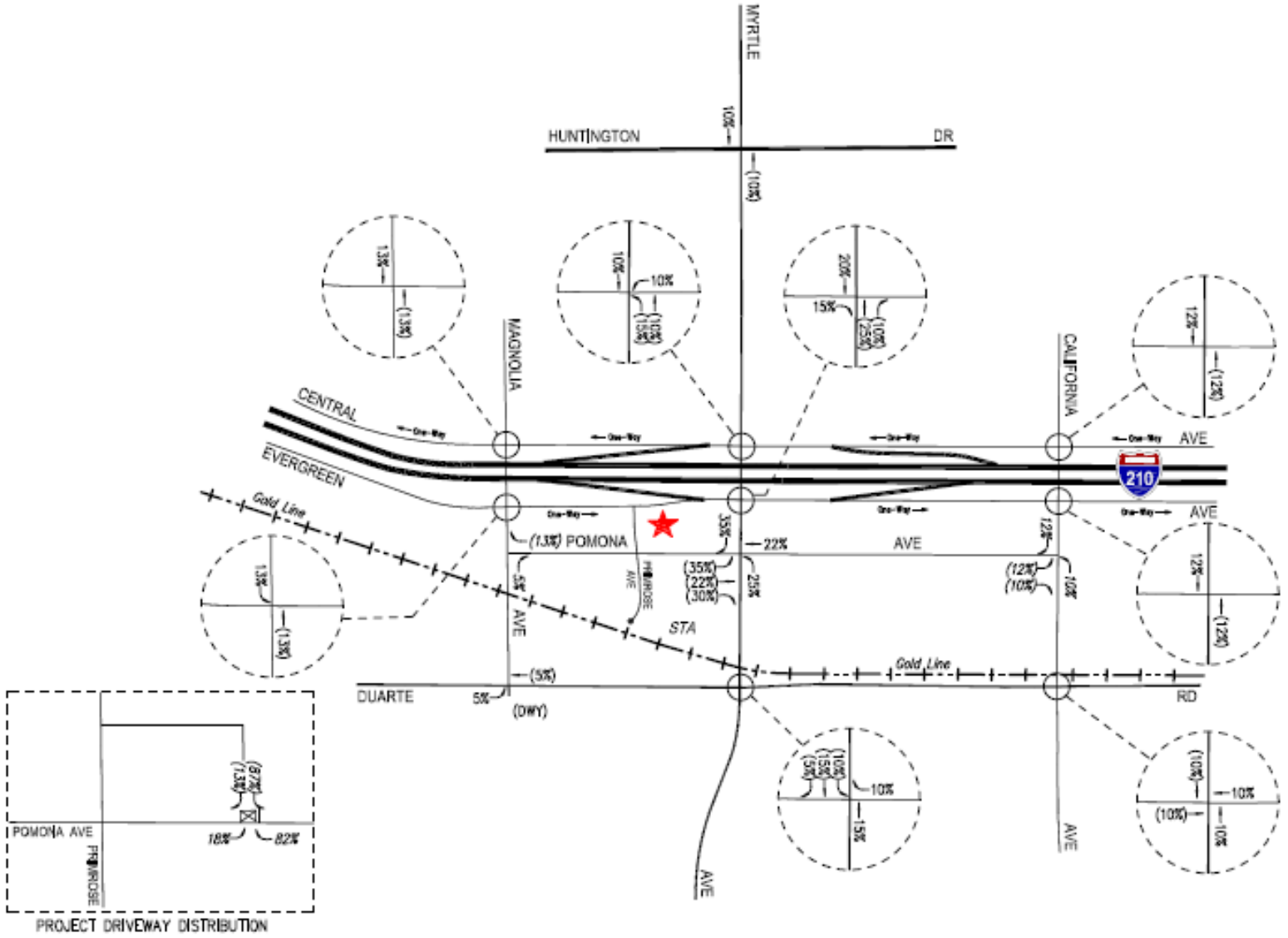


Table 4.17-1
Volume to Capacity Ratio and Levels of Service: Weekday AM and PM Peak Hours

NO.	INTERSECTION	PEAK HOUR	[1] YEAR 2018 EXISTING V/C or DELAY	[1] LOS [a]	[2] YEAR 2018 EXISTING W/ PROJECT V/C or Delay	[2] LOS [a]	[2] CHANGE V/C or DELAY [(2)-(1)]	[2] SIGNIF. IMPACT [b]	[3] YEAR 2022 FUTURE PRE-PROJECT V/C or DELAY	[3] LOS [a]	[4] YEAR 2022 FUTURE W/ PROJECT V/C or DELAY	[4] LOS [a]	[4] CHANGE V/C or DELAY [(4)-(3)]	[4] SIGNIF. IMPACT [b]
1	Magnolia Avenue/ Central Avenue [c]	AM	13.4	B	13.4	B	0.0	--	16.8	C	16.9	C	0.1	--
		PM	14.1	B	14.3	B	0.2	--	19.3	C	19.9	C	0.6	--
2	Magnolia Avenue/ Evergreen Avenue [c]	AM	14.8	B	14.8	B	0.0	--	22.2	C	22.3	C	0.1	--
		PM	16.7	C	17.1	C	0.4	--	32.6	D	34.5	D	1.9	--
3	Magnolia Avenue/ Duarte Road	AM	0.624	B	0.626	B	0.02	No	0.684	B	0.686	B	0.02	No
		PM	0.590	A	0.593	A	0.03	No	0.660	B	0.663	B	0.03	No
4	Myrtle Avenue/ Huntington Drive	AM	0.757	C	0.760	C	0.003	No	0.843	D	0.847	D	0.004	No
		PM	0.757	C	0.763	C	0.006	No	0.855	D	0.862	D	0.007	No
5	Myrtle Avenue/ Central Avenue	AM	0.774	C	0.784	C	0.010	No	0.860	D	0.870	D	0.010	No
		PM	0.877	D	0.884	D	0.007	No	0.960	E	0.968	E	0.008	No
6	Myrtle Avenue/ Evergreen Avenue	AM	0.671	B	0.686	B	0.015	No	0.772	C	0.791	C	0.019	No
		PM	0.835	D	0.843	D	0.008	No	0.918	E	0.926	E	0.008	No
7	Myrtle Avenue/ Pomona Avenue	AM	0.424	A	0.430	A	0.006	No	0.504	A	0.517	A	0.013	No
		PM	0.534	A	0.560	A	0.026	No	0.661	B	0.687	B	0.026	No
8	Myrtle Avenue/ Duarte Road	AM	0.768	C	0.771	C	0.003	No	0.848	D	0.851	D	0.003	No
		PM	0.875	D	0.877	D	0.002	No	0.958	E	0.960	E	0.002	No
9	California Avenue/ Central Avenue	AM	0.357	A	0.357	A	0.00	No	0.368	A	0.368	A	0.000	No
		PM	0.343	A	0.344	A	0.01	No	0.354	A	0.356	A	0.002	No

Table 4.17-1 (Continued)
Volume to Capacity Ratio and Levels of Service: Weekday AM and PM Peak Hours

NO.	INTERSECTION	PEAK HOUR	[1] YEAR 2018 EXISTING V/C or DELAY	[1] LOS [a]	[2] YEAR 2018 EXISTING W/ PROJECT V/C or Delay	[2] LOS [a]	[2] CHANGE V/C or DELAY [(2)-(1)]	[2] SIGNIF. IMPACT [b]	[3] YEAR 2022 FUTURE PRE-PROJECT V/C or DELAY	[3] LOS [a]	[4] YEAR 2022 FUTURE W/ PROJECT V/C or DELAY	[4] LOS [a]	[4] CHANGE V/C or DELAY [(4)-(3)]	[4] SIGNIF. IMPACT [b]
10	California Avenue/ Evergreen Avenue	AM	0.384	A	0.384	A	0.000	No	0.396	A	0.397	A	0.001	No
		PM	0.463	A	0.463	A	0.000	No	0.478	A	0.478	A	0.000	No
11	California Avenue/ Duarte Road	AM	0.521	A	0.522	A	0.001	No	0.563	A	0.564	A	0.01	No
		PM	0.653	B	0.656	B	0.003	No	0.723	C	0.725	C	0.02	No

Table 4.17-2
Related Projects List and Trip Generation

MAP NO.	PROJECT STATUS	PROJECT NAME/NUMBER ADDRESS/LOCATION	LAND USE DATA		PROJECT DATA SOURCE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			LAND-USE	SIZE			IN	OUT	TOTAL	IN	OUT	TOTAL
City of Monrovia												
M1	Under Construction	Former Albertsons Center 725 E. Huntington Boulevard	Retail	98,000 GLSF	[3]	4,185	58	36	94	175	189	364
M2	Under Construction	530 Fano Street	Condominium	12 DU	[4]	70	1	4	5	4	2	6
M3	Built	City of Hope 1218 S. 5th Avenue	Research and Development Center	42,936 GSF	[5]	348	43	9	52	7	39	46
M4	Planning Review	Alexan 1625 Magnolia Avenue	Apartment Live Work	432 DU 4 DU	[6]	1,938	12	131	143	132	62	194
M5	Under Construction	MODA Southwest corner of Pomona Avenue between Primrose Avenue and Magnolia Avenue	Apartment	261 DU	[7]	1,736	27	106	133	105	57	162
M6	Built	5th & Huntington 1110-1212 S. 5th Avenue	Apartment Retail	154 DU 1,340 GLSF	[8]	736	(11)	56	45	56	11	67
M7	Approved	239 W. Chestnut Avenue	Condominium	10 DU	[4]	58	1	3	4	3	2	5
M8	Built	303 S. Madison Avenue	Single-Family Residential	6 DU	[9]	57	1	4	5	4	2	6
M9	In Planning Review	717-721 W. Duarte Road	Condominium	8 DU	[4]	46	1	3	4	3	1	4
M10	Approved	205 and 225 W. Duarte Road, 1725 Peck Road	Apartment	296 DU	[7]	1,968	30	121	151	120	64	184
M11	Planning Review	825 S. Myrtle Avenue	Apartment Retail	154 DU 3,440 GLSF	[10]	721	(11)	38	27	44	8	52
M12	Proposed	Northeast corner of Myrtle Avenue and Lime Avenue	Apartment	140 DU	[7]	931	14	57	71	57	30	87
M13	Planning Review	Block bounded by Evergreen Avenue to the north, Pomona Avenue to the south, Primrose Avenue to the east, and Magnolia Avenue to the west.	Apartment Retail	284 DU 7,080 GLSF	[11]	1,034	(6)	50	44	56	18	74
M14	Planning Review	Marriott Town Place Suites 102-140 W. Huntington Drive	Hotel	109 Occ. Rm	[12]	891	34	24	58	34	31	65

Table 4.17-2
Related Projects List and Trip Generation

MAP NO.	PROJECT STATUS	PROJECT NAME/NUMBER ADDRESS/LOCATION	LAND USE DATA		PROJECT DATA SOURCE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			LAND-USE	SIZE			IN	OUT	TOTAL	IN	OUT	TOTAL
City of Monrovia												
M15	Proposed	1601 Myrtle Avenue (current City Park-and Ride Lot)	Hotel	100 Occ. Rm	[13]	892	39	28	67	34	36	70
M16	Proposed	239 W. Huntington Drive	Coffee Shop	2,200 GSF	[14]	1,801	113	108	221	47	47	94
Los Angeles County												
L1	Approved	1901-1909 Peck Road	Condominium	10 DU	[4]	58	1	3	4	3	2	5
City of Duarte												
D1	Under Construction	1634 Third Street and 1101 Oak Avenue	Condominium	18 DU	[4]	105	1	7	8	6	3	9
D2	Approved	Duarte Town Center Mixed-Use Project 1405-1437 Huntington Drive	Apartment Retail	161 DU 3,500 GLSF	[7] [3]	1,071 149	16 2	66 1	82 3	65 6	35 7	100 13
D3	Approved	Duarte Station TOD Northwest corner of Highland Avenue and Duarte Road	Apartment Office Hotel Retail	475 DU 400,000 GSF 250 Occ. Rms. 12,000 GLSF	[7] [15] [13] [3]	3,159 4,412 2,230 512	48 549 97 7	194 75 71 5	242 624 168 12	192 101 86 22	103 495 89 23	295 596 175 45
D4	Proposed	City of Hope Specific Plan 1500 Duarte Road	City of Hope (Population Net Increase)	2,945 Persons	[16]	4,753	448	66	514	74	388	462
D5	Approved	Planet Fitness 1193 Huntington Drive	Health Club	15,862 GSF	[17]	522	11	11	22	32	24	56
D6	Approved	946-962 Huntington Drive	Condominium	25 DU	[4]	145	2	9	11	9	4	13
D7	Proposed	928 Huntington Drive	Condominium	22 DU	[4]	128	2	8	10	7	4	11
D8	Approved	1525 Huntington Drive	Restaurant (Outdoor Dining Addition)	5,200 GSF	[18]	468	2	2	4	26	13	39
City of Arcadia												
A1	Proposed	323-325 N. 1st Avenue	Medical Office Retail	5,420 GSF 1,806 GLSF	[19] [3]	196 77	10 1	3 1	13 2	5 3	14 4	19 7

A2	Proposed	117-129 E. Huntington Drive 124, 126 & 134 E. Wheeler Avenue	Apartment Retail	170 DU 13,900 GLSF	[7] [3]	1,131 594	17 8	70 5	87 13	68 25	37 27	105 52
A3	Under Construction	56 E. Duarte Road	Condominium Retail	37 DU 19,360 GLSF	[4] [3]	215 827	3 12	13 7	16 19	13 35	6 37	19 72
A4	Under Construction	57 Wheeler Avenue	Apartment Retail	38 DU 16,175 GLSF	[7] [3]	253 691	4 10	15 6	19 16	16 29	8 31	24 60
TOTAL						39,108	1,597	1,416	3,013	1,704	1,953	3,657

[1] Sources: City of Monrovia Community Development Department - Planning Division, Los Angeles County Department of Regional Planning, City of Arcadia Development Services Department - Planning Division, and City of Duarte Community Development Department - Planning Division. Trip generation for the related projects are based on ITE "Trip Generation Manual", 9th Edition, 2012 (as referenced in the Project Data Source column), unless otherwise noted.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 820 (Shopping Center) trip generation average rates.
[4] ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates.
[5] ITE Land Use Code 760 (Research and Development Center) trip generation average rates.
[6] Source: "Traffic Impact Analysis for 1625 Magnolia Avenue", prepared by LSA, May 2018.
[7] ITE Land Use Code 220 (Apartment) trip generation average rates.
[8] Source: "Traffic Impact Analysis for 5th Avenue/Huntington Drive Mixed-Use Project", prepared by LLG Engineers, December 27, 2012.
[9] ITE Land Use Code 210 (Single Family Detached Housing) trip generation average rates.
[10] Source: "Traffic Impact Analysis for Avalon Monrovia", prepared by LSA, March 2018.
[11] Source: "Transportation Impact Study for The Arroyo at Monrovia Station Project", prepared by LLG Engineers, February 2019.
[12] Source: "Traffic Impact Analysis for Monrovia Hotel", prepared by LSA, May 2018.
[13] ITE Land Use Code 310 (Hotel) trip generation average rates.
[14] ITE Land Use Code 937 (Coffee/Donut Shop with Drive-Through) trip generation average rates.
[15] ITE Land Use Code 710 (General Office) trip generation average rates.
[16] Source: "Draft Transportation Impact Study for the City of Hope", prepared by Fehr & Peers, April 2017. The City of Hope Specific Plan build-out year is expected to be by the year 2035, which is beyond the build-out year for the proposed 123 W. Pomona project.
[17] ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates.
[18] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates.
[19] ITE Land Use Code 720 (Medical-Dental Office Building) trip generation average rates.

As presented Table 10-1 in Appendix H, 8 of the 11 study intersections are expected to operate at LOS D or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects traffic under the future without project conditions. The following three remaining study intersections are anticipated to operate at LOS E, (which represents long lines of waiting vehicles through several signal cycles) for the peak hour shown below with the addition of related projects traffic and ambient traffic:

- No. 5: Myrtle Avenue/Central Avenue PM Peak Hour: v/c=0.961, LOS E
- No. 6: Myrtle Avenue/Evergreen Avenue PM Peak Hour: v/c=0.915, LOS E
- No. 8: Myrtle Avenue/Duarte Road PM Peak Hour: v/c=0.958, LOS E

Future with Project Conditions
As shown in Appendix H column 4 of Table 10-1, application of the City's threshold criteria to the "Year 2022 Future with Project" scenario indicates that the proposed project is not expected to result in a significant impact at any of the 11 study intersections during the weekday morning and afternoon peak hours. Incremental impacts consist of measurable increases in ambient traffic and traffic generated that does not exceed LOS standards. In Appendix H, Figures 9-5 and 9-6 illustrate the future with project traffic volumes at the study intersections during the weekday AM and PM peak hours. Incremental, but not significant, impacts are noted at the remaining study intersections. Incremental impacts consist of measurable increases in ambient traffic and traffic generated that does not exceed LOS standards.

Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections.

Caltrans Freeway Segment Analysis
According to the Caltrans highway design manual, analysis of Caltrans facilities should be conducted when and if a proposed project is expected to add 50 or more peak hour trips in either direction on a freeway mainline segment. The proposed project at build-out is not expected to generate 50 or more vehicle trips, during either the weekday AM or PM commute peak hours, at any freeway mainline location. Thus, any freeway mainline location would not exceed the threshold for preparation of a Caltrans freeway mainline analysis.

However, the following mainline freeway segments along the I-210 freeway have been identified for analysis based on their proximity to the project site and the expected level of project-generated traffic. These segments are forecast to experience a relatively greater percentage of project-related traffic than other mainline freeway segment locations:

- I-210 west of Myrtle Avenue
- I-210 east of Myrtle Avenue

The proposed project's effect on the regional mainline freeway system has been determined based on a review of available traffic volume data for existing weekday peak hour conditions. As presented in Table 11-3 of the Traffic Impact Report, adequate storage areas are provided to accommodate the forecast 95th percentile queues under the Existing Year 2018 With Project and Future Year 2022 Without Project and With Project conditions. Therefore, based on a review of the queuing analyses and the available storage lengths, vehicle queuing back onto the I-210 freeway mainline travel lanes is not expected.

Congestion Management Program Analysis

As required by the Congestion Management Program (CMP), a Traffic Impact Assessment (TIA) had been prepared to determine the potential impacts on designated monitoring locations on the CMP highway system. The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed project will add 150 or more trips (in either direction) during either the weekday AM or PM peak periods. The proposed project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to CMP freeway monitoring locations which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. As summarized in the traffic study Table 7-1in Appendix H, the proposed project is anticipated to generate at most 73 total net new trips during the AM peak hour and 111 total net new trips during the PM peak hour. This is well below the 150 trips threshold. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

For intersections, the CMP TIA guidelines require that monitoring locations must be examined if the proposed project will pass 50 or more trips during either the weekday AM or PM peak hours. The proposed project would not add 50 or more trips during either the weekday AM or PM peak hours. At the CMP monitoring intersections, as stated om the CMP manual as the threshold criteria for a traffic impact assessment. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

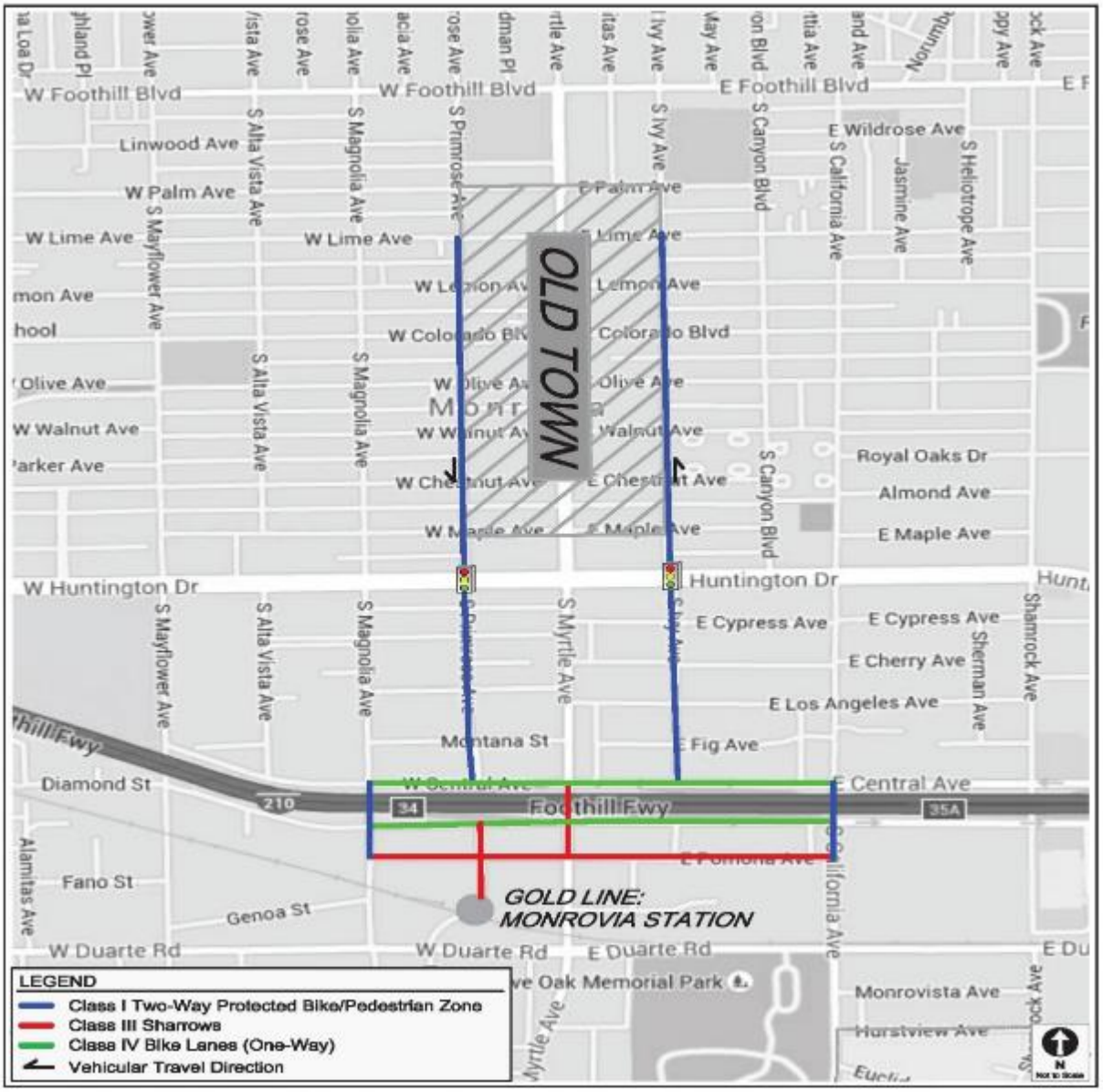
The result of the CMP traffic assessment indicated that the proposed project would not adversely affect any CMP arterial monitoring or intersection monitoring locations.

As identified in the results of the Traffic Impact Analysis, the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, considering all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. The proposed project is not expected to result in a significant impact at any of the 11 study intersections during weekday morning and afternoon peak hours. Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections.

Bicycle

Existing or proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, etc.) in the City's 2016 Bicycle Master Plan are located within an approximate one-mile radius from the project site (Figure 16).

Figure 16: Surrounding Bikeways



The 2016 BMP was amended in 2018, and the following bikeways are planned adjacent to the project site:

- Class IV protected, one-way bike lane is planned on Evergreen Avenue
- Class III shared and signed bike route is planned on Primrose Avenue and Pomona Avenue

No set time frame has been established for these planned bikeways. However, the proposed project incorporates 163 short-term and long-term bike parking with storage on the exterior ground floor and within the parking areas. Short-term bike parking serves people who leave their bicycles for relatively short periods of time, typically for shopping or errands, eating, or recreation. Long-term bike parking includes bike lockers and bike rooms, serving people who intend to leave their bicycles for longer periods of time. The eight spaces provided for commercial uses represent the only public spaces; and 155 spaces are for project residents. Therefore, the proposed project would not conflict with adopted

policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. And the proposed project would remain in compliance with all applicable plans and adopted policies.

Pedestrian
The site plan includes walkway and pedestrian access improvements along West Pomona Avenue and South Primrose Avenues. Connectivity with the vehicular, bike, bus and rail transit is incorporated in the project design.

Mass Transit
The proposed project would not result in a conflict with adopted policies, plans, or programs regarding public transit. The project site is accessible by Foothill transit public bus route 270. A stop is located on West Pomona Avenue directly in front of the project site. The project site is 0.5 miles north of the Metro Gold line which provides regional rail access to Los Angeles County destinations. Bicycle access to the project site is facilitated by the City of Monrovia bicycle roadway network.

Therefore, with adherence to existing regulations, the proposed project would not result in a conflict with adopted policies, plans, or programs regarding transportation, public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, the project would result in a less than significant impact.

b) **Less than Significant Impact.** Pursuant to CEQA Guideline Section 15064.3 (b)(1) projects within ½ mile of a Major Transit Stop (MTS) are presumed to have a less than significant Vehicle Miles Traveled (VMT) impact. The project site is serviced by Foothill Transit bus service (Lines 187 and 270), Metro bus line 264, and Metro Gold Line light rail. The project's VMT impact would be less than significant due to the project's proximity to the Metro Gold Line regional serving transit infrastructure.

c) **No Impact.** The design of the proposed project would comply with all applicable City of Monrovia zoning, building and safety, and fire codes, including driveway design criteria with respect to width, turning radii, sight distance and roadway access and spacing criteria. Therefore, the proposed project would result in a less than significant impact. There are no public airports or private airports with two miles of the project site. The project would not increase air traffic levels or a substantially increase safety risks. Therefore, the project would result in no impact.

d) **Less Than Significant Impact.** The project's emergency access requirements of Monrovia Fire and Rescue Department require emergency access to the site, queuing, and access driveway widths among other requirements. The City's project entitlement requirements include review of the site plan for Fire Department's approval. Thus, the proposed project would result in less than significant impacts regarding emergency access as the proposed project would be required to comply with all applicable Fire Department regulations.

4.18 – Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	□	□	☑	□
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	□	☑	□	□

a) **Less than Significant Impact.** CEQA defines Tribal Cultural Resources as either a site, feature, place, or 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, on the CRHR or on a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1 (k), or a resource determined by a lead agency in its discretion and supported by substantial evidence, to be significant according to the historic register criteria in Public Resource Code Section 5024.1 (c), and considering the significance of the resources to a California Native American Tribe. Results of the records research conducted at the CHRIS-SCCIC and a sacred Lands File Search commissioned through the NAHC failed to indicate any Tribal Cultural Resources on site. The proposed project is not located in an area listed by the City of Monrovia as a historic resource, and no known Tribal Cultural Resources are known to occur at the project site. The proposed project would not be listed as a California Registered Historic resource. Therefore, the proposed project would result in no adverse change in the significance of a historical resource, as defined in Section 15064.5. Therefore, impacts would be less than significant.

b) **Less than Significant Impact with Mitigation Incorporated.** As defined by CEQA, Tribal Cultural Resources are either a site, feature, place, or 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, on the CRHR or on a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k), or a resource determined by a lead agency, in its discretion.

AB 52

California Assembly Bill 52 (AB 52) requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project.

The AB 52 process commenced on October 15, 2018 and concluded on January 10, 2019. Six tribal governments were contacted; of the six contacted; only one tribal government the Gabrieleno Band of Mission Indians-Kizh Nation requested consultation with the City. Consultation concluded on January 10, 2019. As a result of consultation, suggested mitigation measures regarding impacts to tribal cultural resources have been incorporated into this Initial Study/Mitigated Negative Declaration.

The results of the records research compiled from the CHRIS-SCCIC and the Sacred Lands File Search (commissioned through the NAHC) failed to indicate known Tribal Cultural Resources within the project boundaries or within a one-half mile radius of the project site, as specified in Public Resources Code (PRC): 210741, 5020.1(k), or 5024.

Despite the heavy disturbances of the project site that may have displaced or submerged archaeological resources relating to Tribal Cultural Resources on the surface, it is possible that intact tribal cultural resources exist at depth. Therefore, with mitigation measures CUL-1 through CUL-5, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Refer to Mitigation Measures CUL-1 through CUL-5.

4.19 – Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	□	□	☑	□
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	□	□	☑	□
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	□	□	☑	□
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	□	□	☑	□
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	☑	□

Impacts to Utilities and Utilities Systems were evaluated based on information in the Water Quality/Hydrology/Sewer Studies (see Appendix I for detail).

a) **Less Than Significant Impact.** Wastewater discharges from the proposed project would be treated by the Sanitation Districts of Los Angeles County (LACSD) at the San Jose Creek Reclamation Plant (near Whittier) and the Whittier Narrows Reclamation Plant (in El Monte). Both plants are part of the District's extensive Joint Outflow System which has a combined capacity of nearly 600 million gallons per day (MGD). The San Jose Creek Water Reclamation Plant is designed for primary, secondary, and tertiary treatment for up to 100 MGD of wastewater and serves a population of approximately one million people; the plant treats an average flow of approximately 64.6 MGD. The Whittier Narrows Reclamation

Plant is designed for treatment of up to 15 million MGD of wastewater and serves a population of approximately 150,000 people; the plant treats an average flow of approximately 7.3 MGD .

Wastewater
The proposed project would result in wastewater discharges consisting of black water from restrooms and gray water from residential kitchens and showers. These are common wastewater discharges and would not require special processing at the treatment plants. Monrovia's 2015 Urban Water Management Plan (UWMP) cites an estimated 80 gallons per day per person wastewater generation rate (this is for the LACSD's service area).

The proposed project is anticipated to generate an estimated a maximum growth projection of 570 residents, resulting in about 45,600 gallons per day (gpd) of wastewater. A sewer capacity study was performed for the entirety of the 127 Pomona Specific Plan project site and is discussed below. Pursuant to the MMC and Station Square Specific Plan, each development in the Station Square Transit land use designation is asked to pay for a share fee-in-lieu of improvements, or the project would be conditioned to have its own studies performed.

The City uses 250 gallons per day (GPD) per residential unit (regardless of the number of bedrooms) to determine the sewer flow. Commercial usage would have an assumption rate of 5 with a sewer generation rate of 2,000 GPD for retail space. In total, the proposed project would be anticipated to generate about 47,600 gpd of sewage. This would not cause the treatment plants to exceed the treatment capacity of 100 MGD and 15 MGD for the plants as specified in the wastewater discharge requirements (WDR), considering this is less than one percent of either facilities' design flow. This is consistent with the Monrovia General Plan Proposed Land Use and Circulation Elements EIR that projects a population of 58,805 in 2030. The UWMP assumes an increase in wastewater generation accounting for 0.3% of the reclamation plants' capacity. Therefore, impacts would be less than significant.

Water
Water upgrades are required to serve the proposed project. The City has identified two water system improvements: 1), a booster pump and 2) an upgrade of 980 feet of water pipe from 8-inch to 12-inch. These improvements are necessary to ensure adequate fire flow, head loss, and pressure to the City's water system in the Mountain Zone, which includes the project site. The proposed project would introduce two external points of connections. The City is in the process of designing the improvements and anticipates releasing a bid document for the improvements at the end of 2019. The City plans to install the improvements and assess those properties benefitted—including the subject property—on a pro rata basis. The new facilities would ensure adequate water conveyance lines and fire flows are in place to serve the proposed project. Impact would be less than significant.

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

According to the City's 2015 UWMP, the City consumed approximately 6,200 acre-feet of water in 2015. The City projects an increase in consumption to about 7,000 acre-feet in 2035. Consumption is expected to increase incrementally over this time period.

The 2015 UWMP states a goal of limited per-capita consumption ranges from 142 to 160 gallons per capita per day (GPCD), depending upon assumptions regarding water conservation efforts. (The GPCD metric incorporates all users, both residential and nonresidential.) Currently, consumption is approximately 153 GPCD. The residential component of the project would accommodate approximately 570 residents. Based on the current consumption rate of 153 GPCD, the proposed project would consume approximately 87,210 gallons per day (gpd), or 97.7 acre-feet per year. This represents approximately 1.4 percent of the projected citywide water consumption in 2035 (7,000 acre-feet). Given existing and future projected groundwater supplies, along with the City's ability to access imported water, the City has adequate water supplies to serve the proposed project, and no new entitlements would be needed. Therefore, the proposed project's impacts would be less than significant.

c) **Less than Significant Impact.** The City of Monrovia operates and maintains a sanitary sewer collection system composed of approximately 92 miles of City sewers, with pipelines varying from six to 24 inches in diameter. The City provides local sewage collection service via in-street lines that connect to regional trunk lines. Persons wishing to make a sewer connection to the sewer system are required to pay a connection fee for sewerage system capacity. In addition, a LACSD connection fee for sewer connection may be required. A 12-inch diameter sewer main runs southerly in Myrtle Avenue and turns west at Chestnut Avenue, and project related sewage would flow to this sewer main. Therefore, as discussed in Sections 4.18(a) and (d), the project would not require the construction of new water or wastewater treatment facilities.

As a standard condition, prior to issuance of building permits, the developer would provide the City with a detailed study that identifies any minor modifications required to the existing conveyance system to accommodate proposed project needs. The proposed project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore, the impact would be less than significant.

As identified by LACSD, treatment plants would not exceed the treatment capacity of 100 MGD and 15 MGD for the plants as specified in the WDRs. The UWMP assumes an increase in wastewater generation accounting for 0.3% of the reclamation plants' capacity. Therefore, the impacts would be less than significant.

The project site is currently developed with light industrial buildings and paved surfaces. Specific plan regulations require the proposed project to comply with MMC Chapter 12.36 (Storm Water and Urban Runoff Pollution Control) and the City's Low Impact Development (LID) standards. No new storm drain facilities are required to be constructed to serve the proposed project. Therefore, impact would be less than significant.

d) **Less than Significant Impact.** CalRecycle's Disposal Reporting System (DRS) indicated that the City of Monrovia generated about 28,500 tons of disposed solid waste in 2016; this translates to an average of 4.2 pounds per person per day, or 1,535 pounds per person per year. According to the DRS, waste generated in the City was sent to numerous landfills in the region. The Mid Valley landfill received the most of any facility (13,177 tons), followed by the San Timoteo Sanitary Landfill (5,294), the Olinda Alpha Sanitary Landfill (2,958 tons), the Sunshine Canyon City/County Landfill (2,310 tons), the El Sobrante Landfill (1,942 tons), and the Frank R, Bowerman Sanitary Landfill (1,075 tons). The following landfills received relatively small amounts of solid waste: (1) the Azusa Land Reclamation County

Landfill (689 tons) and (2) the Chiquita Canyon Sanitary Landfill (363 tons). CalRecycle projected under a medium growth scenario, 32 million tons of remaining capacity in 2025.

The proposed project is anticipated to have 570 residents. Assuming the per capita 1,535 pounds per person per year rate, this results in about 874,950 pounds (437 tons) of solid waste generated annually. The proposed project also includes 10,000 square feet of ground floor commercial. Cal Recycle provides estimates of waste generation by land use type. The report typically reports these estimates based on the number of employees for most land uses; however, the report does provide an estimate for commercial centers based on square footage (2,028 lbs per 1,000 square feet), resulting in an estimated 20,280 pounds (10 tons) of waste annually. Therefore, combining the commercial and the residential waste, the proposed project is anticipated to generate about 447 tons annually of solid waste. It is likely that the actual waste generation rate would be lower, as additional solid waste strategies and policies are implemented over the term of the proposed project, which would also be subject to the City's construction and residential recycling programs. Overall, the amount waste produced is nominal in relation to landfill capacity.

The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Nor would the proposed project would not result in a substantial increase in solid waste generation. Therefore, impacts would be less than significant.

e) **Less than Significant Impact.** The primary State legislation regarding solid waste is AB939, The Integrated Waste Management Act, adopted in 1989. AB939 requires local jurisdiction to achieve a minimum 50 percent solid waste diversion rate. A minimum 50 percent diversion rate for construction demolition and debris is also required. Recently, AB341 (2011) was adopted requiring mandatory commercial recycling programs. The proposed project is a mixed-use development that does not have any unusual waste production characteristics and thus would not include any component that could conflict with State laws governing construction or operational solid waste diversion. The proposed project would comply pursuant to local implementation requirements. The proposed project would comply with federal, State, and local statutes related to the management of solid waste. This includes the City's construction and demolition disposal and recycling requirements.

The City requires projects that include demolition and/or construction of structures of 1,000 square feet or greater to acquire a construction/demolition permit. A Waste Management Plan (WMP), included as Standard Condition SC UT-1, must be completed and submitted to the Public Works department for the proposed project. A performance security must be paid in the amount of $0.20 per square foot or $250, whichever is greater. The diversion requirements for all projects shall be 50% of the materials generated by an entire Construction and Demolition project. Once the project is complete, a Waste Management Report (WMR) indicating the quantities of material recycled, along with receipts or weight tickets may be submitted. If the WMR indicates that all diversion requirements have been met, the performance. Therefore, impacts would be less than significant.

Standard Conditions

SC UT-1: As applicable, Project Applicants shall comply with the City of Monrovia Construction and Demolition (C&D) Disposal and Recycling Program. The Program includes submitting a C&D Recycling Program Permit Application and a Waste Management Plan to the Public Works Department Environmental Services Division and diverting 50 percent of the total construction and demolition debris generated by the Project.
Requirements and Timing: Applicants shall submit Waste Management Plans to the City Department of Public Works Environmental Services Division for review and approval prior to issuance of building permits. The Waste Management Plan shall be implemented and adhered to throughout construction. **Monitoring:**

City Department of Public Works Environmental Services Division shall review and approve of Waste Management Plans prior to issuance of building permits; City Planning staff shall confirm approval of the Waste Management Plan prior to issuance of building permits and shall confirm compliance with the Waste Management Plan prior to sign off on construction.

4.20 – Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	□	□	□	☑
b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	□	□	□	☑
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment?	□	□	□	☑
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	□	□	□	☑

a) **No Impact.** The project proposed a mixed-use development on existing developed parcels of land in the City of Monrovia The City of Monrovia Fire Chief and Monrovia Police Chief are the primarily decision makers in evaluating what areas need to be evacuated in a wildfire incident. The evacuation procedures and plans are administered in a time of evacuation by the Emergency Operations Center located in the City of Monrovia Police Department. In the event of evacuation, the City would designate an Evacuation Center in the City where residents may evacuate to. The Fire Chief would monitor protocols such as the National Weather Service Red Flag warnings (warning indicating incidences of high sustained winds with dry conditions that precipitate wildfires) and coordinate with local government officials well as businesses to determine if an evacuation is warranted based on the conditions.

Per Policy 4.1.4 of the Safety Element, the City is required to prepare internal emergency response plans for medium and high-rise buildings. The proposed project would be subject to the emergency response plan in the event of a disaster. In addition, Safety Element Policy 4.3.1 requires designation

of evacuation routes for all areas of the City. The City of Monrovia Community Wildfire Protection Plan (MCWPP)[36] identifies areas of wildfire risk in the City and safety zones. The intent of the MCWPP is to educate and manage properties in areas of wildfire risk. The project site is located in a safety zone of the city which is shielded from the very high fire hazard severity zone by the ember protection zone. The project site is located over 2.69 miles south of the Very High Fire Hazard Severity zone and 1.6 miles to the nearest foothills of the San Gabriel National Monument. The proposed project site is not located in a Very High Fire Hazard Severity Zone. Therefore, no impact would not occur.

b) **No Impact.** The proposed project would be located on a previously developed site with light industrial uses and surface parking areas. The proposed project would not create a fire threat as fire behavior is highly influenced by climate, topography and fuel. The project slope is relatively flat and is not located in an area mapped as a high-fire threat area by CAL FIRE[37]. Though climatic temperatures can exceed 90 degrees Fahrenheit, the project site is not surrounded by native habitat nor in a high fire treat area. Prevailing winds due occur seasonally in the City of Monrovia as part of the Santa Ana winds effect, however the proposed project would not exacerbate wildlife risks as native habitat or areas with a high fuel load are present on the site. Therefore, residents within the vicinity of the proposed project would not be unduly exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Furthermore, the Wildfire Hazard Legislation Safety Element Planning and Zoning Law requires that City and Counties adopt a comprehensive general plan with various elements including a safety element for protection of the community from unreasonable risks associated with wildfires. California Government Code Section 51175 et seq. requires the Director of Forestry and Fire Protection to identify areas in the State of California that are considered Very High Fire Hazard Severity Zones. These fire zones are delineated on Fire Hazard Severity Zone Maps created for areas throughout the state, including the Los Angeles County. The proposed project is not located within an area delineated as a Very High Fire Hazard Severity Zone by the General Plan Safety Element or Zoning Code. Therefore, no impact would occur.

c) **No Impact.** In accordance with Senate Bill No. 1241, the Director of Forestry and Fire Protection must identify areas in the State of California that are considered Very High Fire Hazard Severity Zones. Fire threats occur as a result of a combination of climate, topography, vegetation and developmental site characteristics. High fire hazard risks areas are found throughout Los Angeles County in areas adjoining or in the vicinity of the San Gabriel Mountains (San Gabriel National Monument) and foothills. Development that encroaches upon wildland area can expose occupants to a higher fire risk. The proposed project would not result in wildfire impacts, as the project is located in an urbanized area with industrial, and commercial uses located adjacent to the project site. The proposed project would be subject to all applicable Fire and Building Codes including Fire suppression system installation requirements.

No roads, fuel breaks, or emergency water resources would be required for implementation of the proposed project. Installation of new powerlines or other utilities would occur as a result of implementation of the proposed project however utility lines already occur within the vicinity and on the project site. Any new or replacement utility lines would not pose a higher fire risk to the adjacent properties. The proposed project is not located in an area of high fire threat. The proposed project is in

[36] Monrovia Community Wildfire Plan 2014
[37] California Fire Local Responsibility Area 2012 Map [Accessed February 26, 2018].

an urbanized area and would not require the maintenance of associated infrastructure, fuel breaks, emergency water resources, powerlines or other utilities. Therefore, no impact would occur.

d) **No Impact.** Wildland fires are defined as any non-structure fire, other than prescribed burns, that occur in an undeveloped or natural environment. The proposed project is in an urbanized area of the City of Monrovia. The project site is located approximately 2.69 miles south of the San Gabriel National Monument, and the nearest urban interface zone is located 1.6 miles. the proposed project is not anticipated to not expose people or structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability or drainage changes. Therefore, no impact would occur.

4.21 – 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 substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	□	☑	□	□
b) Does the project have impacts that are individually limited, but cumulatively considerable?	□	□	☑	□
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	□	☑	□	□

a) **Less than Significant with Mitigation Incorporated.** The project site is located within an urbanized area with no natural habitat and would not substantially degrade the quality of the surrounding environment. The proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife or habitat for any sensitive species, as discussed in Section 4.4. Nesting birds may occupy existing landscaped trees and shrubs onsite. Therefore. with mitigation,

Mitigation Measures BIO-1 and BIO-2, the proposed project would ensure no impacts would occur to any birds nesting in any of the ornamental vegetation on the project site. Adverse impacts to tribal cultural resources and archaeological and paleontological resources would not occur.

Construction-phase procedures would be implemented in the event any archaeological or paleontological resources are discovered during grading and excavation, consistent with Mitigation Measures CUL-1, CUL-2, CUL-3, CUL-4, and CUL-5. Implementation of these mitigation measures would ensure that impacts related to cultural resources would be less than significant. The project site is not known to have any association with an important example of California's history or prehistory.

b) **Less than Significant.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project. The following projects were considered for the cumulative analysis:

1. 102-140 West Huntington Drive/Townplace Suites by Marriot
2. 725 Huntington Drive Commercial Center
3. MODA Residential Development
4. 1110 - 1212 Fifth Avenue Residential Development
5. 1601 Myrtle Avenue Residential Development
6. Starbucks
7. Corner of Myrtle and Lime Residential Development
8. 1625 Magnolia Avenue Residential Development

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

c) **Less than Significant Impact with Mitigation Incorporated.** Section 4.1 concludes that short-term construction-related air quality impacts would occur but that restrictions on vehicle idling (Mitigation Measure AIR-1) would reduce impacts below levels of significance.

Section 4.9 concludes that hazards and hazardous materials impacts (potential undiscovered site contamination) would be less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2.

Section 4.13 concludes that the proposed project would result in significant short-term construction noise impacts, but that these would be mitigated to less than significant with Mitigation Measure NOI-1.

Based on the preceding analysis of potential impacts in the responses to checklist items 4.1 thru 4.20, no evidence is presented that this proposed project would degrade the quality of the environment. Thus, the City of Monrovia finds that with implementation of the mitigation measures incorporated listed in this Initial Study/Mitigated Negative Declaration, there would be no substantial, adverse impacts on human beings, directly or indirectly.

5 Standard Conditions and Mitigation Measures

Standard Conditions

The following are standard conditions of approval that would be applied to the proposed project.

SC AES-1: Maintenance of Construction Barriers. Prior to issuance of any construction permits, the City of Monrovia 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."
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

SC AES-2: Project lighting shall be directed and shielded to focus illumination on the desired areas only and avoid light trespass into adjacent areas. Reflective glass, metallic, and other highly reflective and glare producing materials shall not be used in new building construction.
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

SC AES-3: 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 [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, onsite 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 onsite lighting shall be shielded and confined within site boundaries.
- No direct rays or glare shall be 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.

Requirements and Timing: The Lighting Plan shall be reviewed and approved prior to issuance of building permits. **Monitoring:** The City's Community Development Director, or designee, shall review and approve the lighting plan prior to issuance of building permits.

SC AIR-1: Comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, by incorporating best available control measures during construction.
Requirements and Timing: Standard condition shall be printed on construction drawings and included as a requirement in the construction contract. **Monitoring:** City staff shall conduct site inspections during construction to ensure that the standard condition is adhered to.

SC AIR-2: Comply with South Coast Air Quality Rule 1113 to reduce VOC emissions from architectural coating applications. Prior to the issuance of a building permit for the Project, the Applicant shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines. The Applicant shall include in any construction contracts and/or subcontracts a requirement that Project contractors adhere to the requirements of the CRP. The CRP shall include a requirement that all interior and exterior residential and non-residential architectural coatings used in Project construction meet the SCAQMD "super compliant" coating VOC content standard of less than 10 grams of VOC per liter of coating. The CRP shall also specify the use of high-volume, low pressure spray guns during coating applications to reduce coating waste.
Requirements and Timing: Applicant shall receive Planning Division approval of a Coating Restriction Plan (CRP) prior to receipt of building permits. **Monitoring:** City Planning staff shall conduct site inspections to ensure that the CRP is followed during construction.

Mitigation Measures

The following mitigation measures are required to reduce potential impacts to less than significant levels.

MM AIR-1: Idling Restrictions. 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 five consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

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

Requirements and Timing: Mitigation measure shall be printed on construction drawings and included as a requirement in the construction contract. **Monitoring:** City staff shall conduct site inspections during construction to ensure that the mitigation measure is adhered to.

MM BIO-1: Pre-Construction Nesting Surveys. To avoid impacts on nesting bird, construction activities and construction noise shall occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occur within the bird nesting season (during the period from February 1 to September 1), all suitable habitats within 100 feet of the project site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the project site is occupied by nesting birds covered under the MBTA and California Fish and Game Code, MM BIO-2 shall apply.

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

MM CUL-1. Conduct Archaeological Sensitivity Training for Construction Personnel. The applicant shall retain a qualified professional Archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall include a handout and focus on how to identify archaeological resources that may be encountered during earthmoving activities; the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional Archaeologist would follow in conducting a salvage investigation, if one is necessary.
Requirements and Timing: This Measure shall be printed on all construction drawings and grading plans. The archaeologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

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

MM CUL-3. Conduct Periodic Archaeological Resources Spot Checks during grading and earth-moving activities in Younger Alluvial Sediments. The applicant shall retain a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct periodic Archaeological Spot Checks beginning at depths below three (3) feet to determine if construction excavations have exposed or have a high probability of exposing archaeological resources. After the initial Archaeological Spot Check, further periodic checks will be conducted at the discretion of the qualified archaeologist. If the qualified Archaeologist determines that construction excavations have exposed or have a high probability of exposing archaeological artifacts, ongoing construction monitoring for archaeological resources will be required. For the ongoing monitoring, the applicant shall retain a qualified Archaeological Monitor and Native American

monitor, who will work under the guidance and direction of a professional archaeologist, who meets the qualifications set forth by the U.S. Secretary of the Interior's Professional Qualifications and Standards. The Archaeological Monitor and Native American monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into non-fill younger Pleistocene alluvial sediments. Multiple earth-moving construction activities may require multiple archaeological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring can be reduced to part-time inspections as directed by the Project Archaeologist.
Requirements and Timing: This measure shall be printed on all construction drawings and grading plans. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM CUL-4. Prepare Report Upon Completion of Monitoring Services. The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the applicant, the South Central Coastal Information Center, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of construction activities and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA, and treatment of the resources. **Requirements and Timing:** This measure shall be printed on all construction drawings. An Archaeological Monitoring Report shall be prepared and submitted for City review and approval prior to final sign off on construction. **Monitoring:** City staff shall review and approve the archaeological monitoring report prior to final sign off on construction.

MM CUL-5. Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during construction, the City of Monrovia and the applicant shall comply with State Health and Safety Code Section 6050.5. The City of Monrovia and the applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, of the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of reburial with the NAHC and the Project Archaeologist shall file a record of the reburial with the CHRIS-SCCIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.
Requirements and Timing: This measure shall be printed on all construction drawings and grading plans. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-1. Prior to the issuance of grading permits, the project proponent/operator shall retain a California registered and licensed engineer to design the proposed project facilities to withstand probable seismically induced ground shaking at the project site. All grading and construction onsite shall

adhere to the specifications, procedures, and site conditions contained in the final design plans, which shall be fully compliant with the seismic recommendations of the California-registered and licensed professional engineer and consistent with the recommendations in the Geotechnical Engineering Investigation by Geotechnologies, Inc. (2018) and any subsequent amendments.

Existing fill, in its present condition, is not suitable for direct support of proposed foundations or slabs, however, it is suitable for re-use as engineered fill provided grading recommendations in the geotechnical report are followed. Where new paving is to be placed, it is also recommended that all existing fill and soft or unsuitable soils be excavated and properly compacted for paving support. **Requirements and Timing:** The Geotechnical Report shall be reviewed and approved by the City Department of Public Works prior to issuance of grading permits. **Monitoring:** City Department of Public Works staff shall review and approve of the geotechnical report prior to issuance of grading permits.

MM GEO-2. Prior to the issuance of grading permits, the project proponent/operator shall retain a California registered and licensed engineer to finalize grading plans and building plans for proposed foundations or slabs. All grading and construction on site shall adhere to the specifications, procedures, and site conditions contained in the final design plans, which shall be fully compliant with the recommendations in the Geotechnical Engineering Investigation by Geotechnologies, Inc. (2018) and any subsequent amendments.
Requirements and Timing: The geotechnical engineers for the project shall sign a title block on the grading and drainage plans stating that the recommendations of the Project's geotechnical report have been followed in the approved plans that he or she is signing. **Monitoring:** City Department of Public Works staff shall confirm that the geotechnical engineer of record has signed the grading and drainage plans prior to issuance of grading permits.

MM GEO-3: Conduct Paleontological Sensitivity Training for Construction Personnel
The applicant shall retain a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training would include a handout and would focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of Paleontological Monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional Paleontologist would follow in conducting a salvage investigation if one is necessary.
Requirements and Timing: Measure shall be printed on all construction drawings. The paleologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-4: Conduct Periodic Paleontological Spot Checks During Grading and Earth Moving Activities. The applicant shall retain a professional Paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct periodic paleontological spot checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks would be conducted at the discretion of the qualified paleontologist. If the qualified Paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources would be required. The applicant shall retain a qualified Paleontological Monitor, who would work under the guidance and direction of a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The Paleontological Monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple

Paleontological Monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional Paleontologist.
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-5: Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources are Encountered. If paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional Paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.
Requirements and Timing: Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure compliance.

MM GEO-6: Prepare Report Upon Completion of Monitoring Services. Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. **Requirements and Timing:** Measure shall be printed on all construction drawings. A paleontologist report shall be prepared and submitted for City review and approval prior to final sign off on construction. **Monitoring:** City staff shall review and approve the monitoring report prior to final sign-off on construction.

MM HAZ-1: The developer shall prepare a Site Management Plan (SMP) for the proposed construction-related excavation and grading activities. The SMP shall address plans for encountering, handling, and disposing of soil potentially impacted by hazardous materials (including pesticides) and/or petroleum products or other yet unidentified features or conditions that may exist.
Requirements and Timing: A qualified hazardous materials consultant shall review the Phase I ESA and develop the Site Management Plan in compliance with ASTM Standard Practice and EPA Standards and Practices. If required by law, the SMP shall be submitted to the appropriate agency, and documentation of SMP approval shall be provided to the City prior to the issuance of a demolition permit. **Monitoring:** City Building and Safety Division staff shall confirm implementation of the Site Management Plan during demolition, grading, and construction.

MM HAZ-2: The California Environmental Protection Agency (Cal/EPA) shall be notified by the City of Monrovia of the results of the Phase I Environmental Site Assessments (ESA) and Phase II (ESA) prepared for the project. All requirements of Cal/EPA, or another regulatory agency granted oversight

authority by Cal/EPA under CERCLA, shall be complied with prior to issuance of grading permits for the portion of the project area subject to CERCLA.
Requirements and Timing: City Planning shall forward copies of the Phase I ESA and the Phase II ESA to Cal/EPA immediately. **Monitoring:** City staff shall ensure that all Cal/EPA requirements are complied with prior to issuance of grading permits for the portion of the project area subject to CERCLA. Cal/EPA shall determine which portion of the project area is subject to CERCLA.

MM NOI-1: Confirm Compliance with Applicable Interior Noise Standard Requirements. Prior to the issuance of a building permit, the City shall review and approve an acoustical analysis, prepared by or on behalf of the Project Applicant, and based on the final Project design, that:

3) Identifies the exterior noise levels at the:
    a. Exterior building facades that face West Evergreen Avenue/I-210, South Primrose Avenue, and South Myrtle Avenue; and
    b. Exterior recreation areas, including patios, that face and have a line of sight to West Evergreen Avenue/I-210, South Primrose Avenue, and South Myrtle Avenue.
4) Identifies the final site and building design features that would attenuate exterior building façade noise levels to interior levels that do not exceed 45 CNEL in habitable rooms and 50 dBA Leq (1-hour) in other occupied rooms. Potential noise insulation site and building design features capable of achieving this requirement may include, but are not limited to:
    - Sound barriers
    - Enhanced exterior wall construction/noise insulation design
    - Use of enhanced window, door, and roof assemblies with above average sound transmission class (STC) or outdoor/indoor transmission class (OITC) values
    - Use of mechanical, forced air ventilation systems to permit a windows-closed condition in residential units.

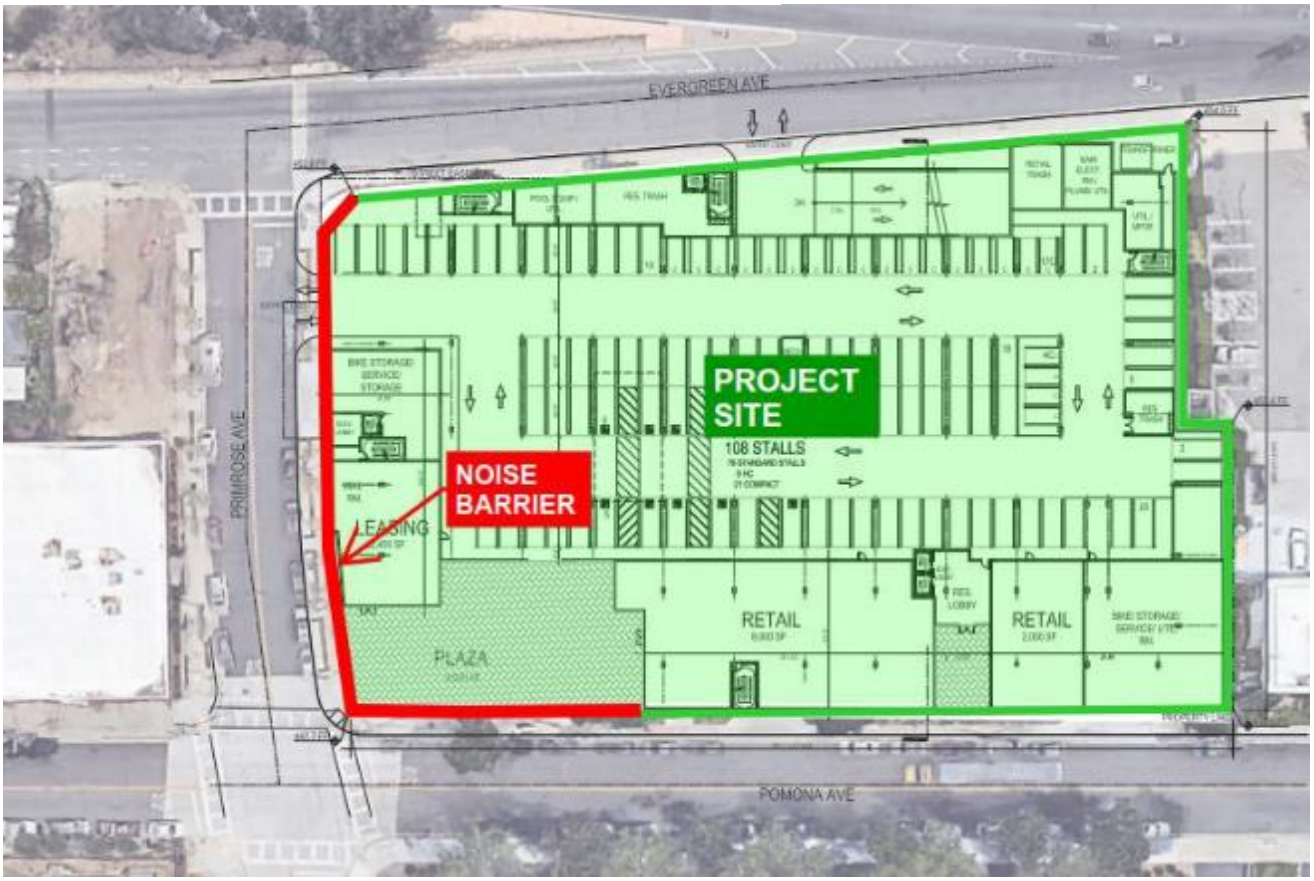
Requirements and Timing: An acoustical report shall be submitted to City Planning for review and approval prior to final sign off on construction, documenting that actual interior and exterior noise level at the locations indicated in this measure, meet City and State standards. **Monitoring:** City staff shall approve the acoustical analysis prior to sign off of final construction.

MM NOI-2: Construction Noise. Prior to the start of construction, the applicant/developer shall install a minimum eight-foot- tall noise barrier along the western and southwest frontage of the project site to reduce line-of-sight noise to sensitive receivers adjacent to the site (see Figure 12). The noise barrier shall consist of the following:

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

These requirements can be adjusted by the City to achieve the noise reduction required to ensure compliance with Monrovia Municipal Code Chapter 9.44 (Noise). An acoustical study prepared by an acoustical engineer shall be provided to document that the barrier will achieve the standards.

Figure 12: Noise Barrier Location



MM NOI-3: To reduce temporary construction noise impacts on adjacent land uses, the Applicant or the Applicant's construction contractor shall implement the following construction-period noise abatement measures:

- *Mufflers.* All construction equipment shall be equipped with muffles and other suitable noise attenuation devices
- *Equipment Selection*. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), to the maximum extent feasible.
- *Notification.* All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule for the proposed Project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can enquire about the construction process and register complaints.
- *Noise Disturbance Coordinator.* 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 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

- *Construction Traffic.* Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.

Requirements and Timing: The developer shall provide the City with a construction management plan that addresses all of the above. **Monitoring:** City staff shall approve the construction management plan prior to the issuance of building permits. The Building Official or designee shall be responsible for responding to any complaints.

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