

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

**LIME AVENUE SELF STORAGE &
COMMERCIAL FACILITY
115-127 EAST LIME AVENUE
MONROVIA, CALIFORNIA**



PREPARED FOR:

**CITY OF MONROVIA
COMMUNITY DEVELOPMENT DEPARTMENT, PLANNING
DIVISION
415 SOUTH IVY AVENUE
MONROVIA, CALIFORNIA 91016**

PREPARED BY:

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
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AUGUST 20, 2019

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Lime Avenue Self Storage and Commercial Facility.

PROJECT ADDRESS: 115-127 East Lime Avenue, Monrovia, CA 91016.

APPLICANT: Monrovia Lime LLC.

CITY AND COUNTY: Monrovia, Los Angeles County.

DESCRIPTION: The proposed project is an application for a General Plan Amendment (GPA), a Zone Change (ZC), a Tentative Parcel Map (TPM), and a Conditional Use Permit (CUP). The proposed project, if approved, will involve a number of interior modifications and exterior improvements to an existing commercial building located in the City's downtown business district (Old Town). The existing building was formerly occupied by Frontier Communications, Inc. and was used for administrative purposes. The existing building will undergo remodeling to accommodate a future self storage use and limited ground floor commercial uses. The remodeled building will include 92,249 square feet of floor area including 85,756 square feet of self storage space and 973 square feet of self storage office space. Four ground-level commercial tenant spaces and commercial hallway (totaling 5,520 square feet) not related to the self storage use, will also be provided along the Lime Avenue frontage. The loading and unloading areas will be located on the building's north elevation. Vehicular access to the proposed project's dedicated parking and loading/unloading area will be provided by the existing alley located to the north of the property. This alley connects to Ivy Avenue. A total of 19 parking spaces including two spaces compliant with the American's with Disabilities Act (ADA) will be provided. In addition, the proposed project will provide ten bicycle parking spaces.

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant environmental impacts. For this reason, the City of Monrovia determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may also be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to degrade the quality of the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

The proposed project is described in greater detail in the attached Initial Study. The environmental analysis is also provided in the attached Initial Study prepared for the proposed project.

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- Appendix C – AB-52 Consultation
- Appendix D –Traffic & Parking Memorandum
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SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The proposed project is an application for a General Plan Amendment (GPA), a Zone Change (ZC), a Tentative Parcel Map (TPM), and a Conditional Use Permit (CUP) to adaptively reuse an existing commercial building located in the City's downtown business district (Old Town). This existing building was formerly occupied by Frontier Communications, Inc. and was used for administrative purposes. The existing 92,249 square foot building will undergo remodeling to accommodate a future self storage use and limited ground floor commercial uses. Refer to Section 2.0, Project Description for additional details.

The City of Monrovia authorized the preparation of this Initial Study.¹ Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Monrovia, in its capacity as the Lead Agency. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

- To provide the City information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration;
- To facilitate the project's environmental assessment early in the design and development of the project;
- To eliminate unnecessary EIRs;
- To determine the nature and extent of any impacts associated with the proposed project; and,
- To enable modification of the project to mitigate adverse impacts of the project.

The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's review pursuant to CEQA. This Initial Study and the *Notice of Intent to Adopt a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 20-day public review period will be provided.² Questions and/or comments should be submitted to the following contact person:

Mr. Austin Arnold, Assistant Planner
City of Monrovia Community Development Department, Planning Division
415 South Ivy Avenue
Monrovia, California 91016

¹ (CEQA Guidelines) § 15050.

² California, State of. *California Public Resources Code. Section 21091 (b)*.

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition. This section also includes a checklist that summarizes the findings of this Initial Study.
- *Section 2 Project Description*, provides an overview of the existing environment as it relates to the project site and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis*, includes an analysis of impacts associated with the proposed project's construction and the subsequent operation.
- *Section 4 Findings*, indicates the conclusions of the environmental analysis and the Mandatory Findings of Significance. In addition, this section includes the Mitigation Monitoring and Reporting Program (MMRP).
- *Section 5 References*, identifies the sources used in the preparation of this Initial Study.

1.3 INITIAL STUDY CHECKLIST

The environmental analysis provided in Section 3.0 of this Initial Study indicates that the proposed project will not result in any unmitigable, significant impacts on the environment. The findings of this Initial Study are summarized in Table 1-1 provided below and on the following pages. It is important to note that the IS/MND utilizes the most current version of CEQA Guidelines Appendix G checklist updated in December 2018.

**Table 1-1
Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
SECTION 3.1 AESTHETICS <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
3.1.A. Have a substantial adverse effect on a scenic vista?			X	
3.1.B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
3.1.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 publically accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
3.1.D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

SECTION 3.2 AGRICULTURE & FORESTRY RESOURCES *Would the project:*

**Table 1-1
Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.2.A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
3.2.B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
3.2.C. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
3.2.D. Result in the loss of forest land or conversion of forest land to a non-forest use?				X
3.2.E. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
SECTION 3.3 AIR QUALITY Would the project:				
3.3.A. Conflict with or obstruct implementation of the applicable air quality plan?			X	
3.3.B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
3.3.C. Expose sensitive receptors to substantial pollutant concentrations?		X		
3.3.D. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?			X	
SECTION 3.4 BIOLOGICAL RESOURCES Would the project:				
3.4.A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
3.4.B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
3.4.C. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.4.D. <i>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?</i>			X	
3.4.E. <i>Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i>				X
3.4.F. <i>Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</i>				X
SECTION 3.5 CULTURAL RESOURCES <i>Would the project:</i>				
3.5.A. <i>Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</i>				X
3.5.B. <i>Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</i>				X
3.5.C. <i>Disturb any human remains, including those interred outside of dedicated cemeteries?</i>				X
SECTION 3.6 ENERGY <i>Would the project:</i>				
3.6.A. <i>Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i>			X	
3.6.B. <i>Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</i>			X	
SECTION 3.7 GEOLOGY & SOILS <i>Would the project:</i>				
3.7.A. <i>Directly or indirectly cause 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 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. Strong seismic ground-shaking? Seismic-related ground failure, including liquefaction? Landslides?</i>			X	
3.7.B. <i>Result in substantial soil erosion or the loss of topsoil?</i>			X	
3.7.C. <i>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?</i>			X	
3.7.D. <i>Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?</i>				X

**Table 1-1
Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.7.E. <i>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?</i>				X
3.7.F. <i>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>			X	
SECTION 3.8 GREENHOUSE GAS EMISSIONS <i>Would the project:</i>				
3.8.A. <i>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i>			X	
3.8.B. <i>Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?</i>			X	
SECTION 3.9 HAZARDS & HAZARDOUS MATERIALS <i>Would the project:</i>				
3.9.A. <i>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i>			X	
3.9.B. <i>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?</i>		X		
3.9.C. <i>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i>				X
3.9.D. <i>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?</i>				X
3.9.E. <i>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?</i>				X
3.9.F. <i>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</i>				X
3.9.G. <i>Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire?</i>				X
SECTION 3.10 HYDROLOGY & WATER QUALITY <i>Would the project:</i>				
3.10.A. <i>Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i>			X	

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.10.B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
3.10.C. Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would: result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows?			X	
3.10.D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
3.10.E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
SECTION 3.11 LAND USE & PLANNING Would the project:				
3.11.A. Physically divide an established community?				X
3.11.B. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	
SECTION 3.12 MINERAL RESOURCES Would the project:				
3.12.A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				X
3.12.B. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X
SECTION 3.13 NOISE Would the project:				
3.13.A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
3.13.B. Generation of excessive ground-borne vibration or ground-borne noise levels ?			X	
3.13.C. For a project located within the vicinity of a private airstrip or- an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
SECTION 3.14 POPULATION & HOUSING Would the project:				

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.14.A. <i>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)?</i>				X
3.14.B. <i>Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</i>				X
SECTION 3.15 PUBLIC SERVICES				
3.15.A. <i>Would the project 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: Fire protection services; Police protection; Schools; Parks; other Governmental facilities?</i>			X	
SECTION 3.16 RECREATION <i>Would the project:</i>				
3.16.A. <i>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?</i>				X
3.16.B. <i>Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</i>				X
SECTION 3.17 TRANSPORTATION <i>Would the project:</i>				
3.17.A. <i>Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>			X	
3.17.B. <i>Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?</i>			X	
3.17.C. <i>Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</i>			X	
3.17.D. <i>Result in inadequate emergency access?</i>				X
SECTION 3.18 TRIBAL CULTURAL RESOURCES				

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
<p>3.18.A. <i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: 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 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 Resource 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 Tribe5020.1(k)?</i></p>			X	
<p>SECTION 3.19 UTILITIES & SERVICE SYSTEMS <i>Would the project:</i></p>				
<p>3.19.A. <i>Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts?</i></p>			X	
<p>3.19.B. <i>Have sufficient water supplies available to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years?</i></p>			X	
<p>3.19.C. <i>Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments</i></p>			X	
<p>3.19.D. <i>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?</i></p>		X		
<p>3.19.E. <i>Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?</i></p>				X
<p>SECTION 3.20 WILDFIRE <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i></p>				
<p>3.20.A. <i>Substantially impair an adopted emergency response plan or emergency evacuation plan?</i></p>			X	
<p>3.20.B. <i>Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</i></p>			X	
<p>3.20.C. <i>Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</i></p>			X	

**Table 1-1
 Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
3.20.D. <i>Expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</i>			X	
SECTION 3.21 MANDATORY FINDINGS OF SIGNIFICANCE <i>Does the project:</i>				
3.21.A. <i>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?</i>		X		
3.21.B. <i>Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</i>			X	
3.21.C. <i>Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</i>		X		

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SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The proposed project is an application for a General Plan Amendment (GPA), a Zone Change (ZC), a Tentative Parcel Map (TPM), and a Conditional Use Permit (CUP). The proposed project, if approved, will involve a number of interior modifications and exterior improvements to an existing commercial building located adjacent to the City's historic commercial downtown (Old Town). The existing building was formerly occupied by Frontier Communications, Inc. and was used for administrative purposes. The existing building will undergo remodeling to accommodate a future self storage use and limited ground floor commercial uses. The remodeled building will include 92,249 square feet of floor area including 85,756 square feet of self storage space and 973 square feet of self storage office space. Four ground-level commercial tenant spaces and commercial hallway (totaling 5,520 square feet) not related to the self storage use, will also be provided along the Lime Avenue frontage. The loading and unloading areas will be located on the building's north elevation. Vehicular access to the proposed project's dedicated parking and loading/unloading area will be provided by the existing alley located to the north of the property. This alley connects to Ivy Avenue. A total of 19 parking spaces including two spaces compliant with the American's with Disabilities Act (ADA) will be provided. In addition, the proposed project will provide ten bicycle parking spaces.³ The proposed project is described in greater detail in Section 2.4.

2.2 PROJECT LOCATION

The existing building is located within the City of Monrovia on the north side of Lime Avenue just east and adjacent to "Old Town." Monrovia is located in the San Gabriel Valley, approximately 15.5 miles northeast of Downtown Los Angeles. The City of Monrovia is bounded on the north by the Angeles National Forest; on the south by a community known as Mayflower Village within the unincorporated area of Los Angeles County; on the east by the cities of Duarte and Bradbury; and, on the west by Arcadia. The location of Monrovia in a regional context is shown in Exhibit 2-1. The project site's legal addresses are 115-127 East Lime Avenue. The site consists of three parcels: 8516-01-2800, 8516-01-2801, and 8516-01-2802. Regional access to the project site is possible from the Foothill Freeway (Interstate 210), located 0.86 miles to the south of the project site. Major roadways in the vicinity of the project site include Foothill Boulevard, located 1,000 feet to the north of the site; Huntington Drive, located 0.52 mile to the south of the project site; Mountain Avenue, located 0.76 miles to the east of the project site; and, Myrtle Avenue, located 140 feet to the west of the project site.⁴

Major physiographic features in the vicinity of the project site include the base of the San Gabriel Mountains which are located approximately 1.6 miles to the north. The San Gabriel River and Canyon are located approximately 4.2 miles to the east. Finally, Eaton Canyon Wash is located approximately 5.5 miles to the northwest. Important geographic features in the immediate area include the City of Monrovia Civic Center (approximately 70 feet to the southeast), Monrovia Library Park (225 feet to the west), Clifton Middle School

³ KSP Studio. *Conceptual Site Plan*. Plan dated May 20, 2019.

⁴ Google Earth. Website accessed March 1, 2019.

(400 feet to the northeast), and the George Anderson House Museum (450 feet to the southeast). A citywide map is provided in Exhibit 2-2 and a local map is in Exhibit 2-3.

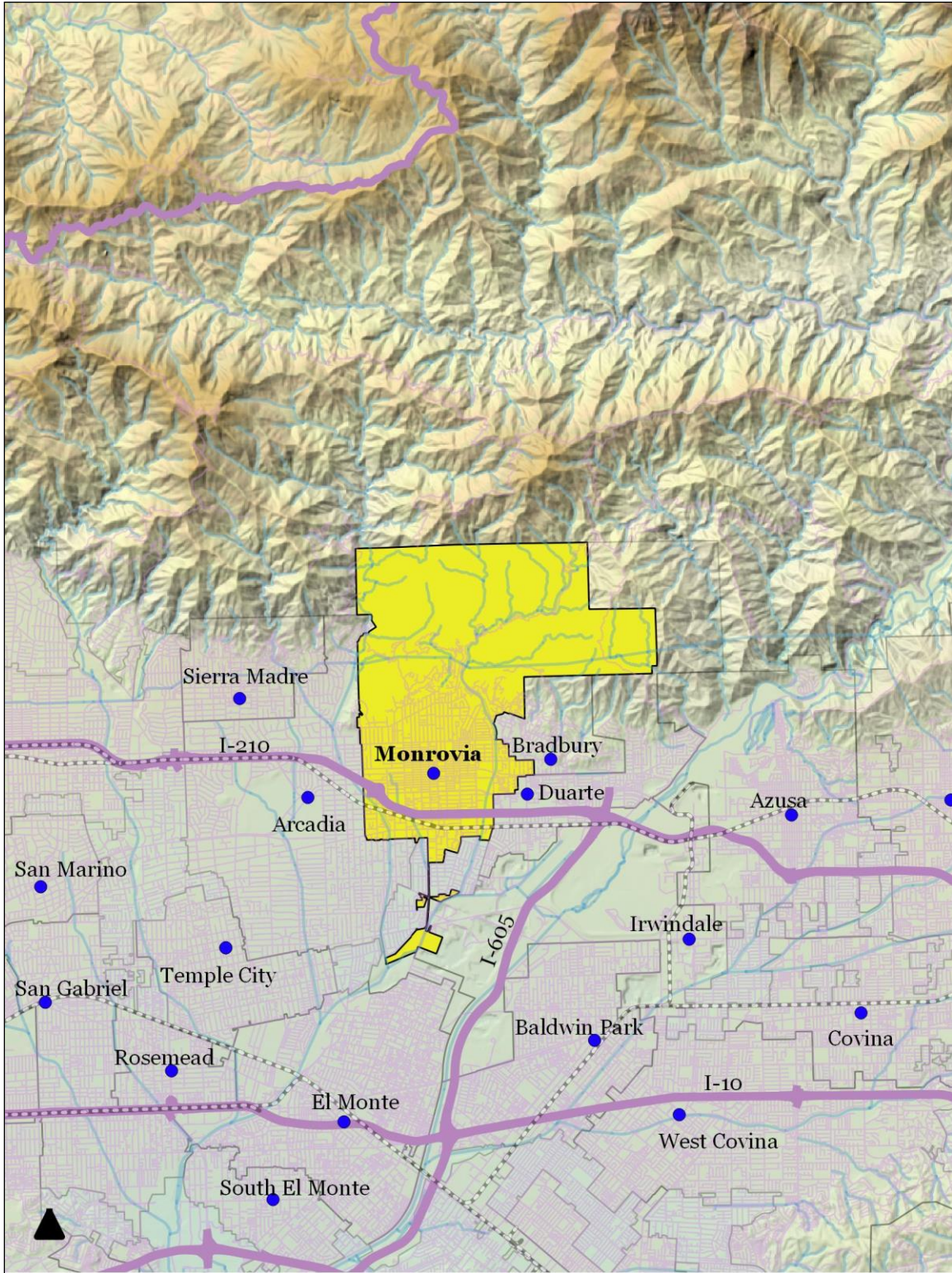


EXHIBIT 2-1
REGIONAL MAP
Source: Quantum GIS

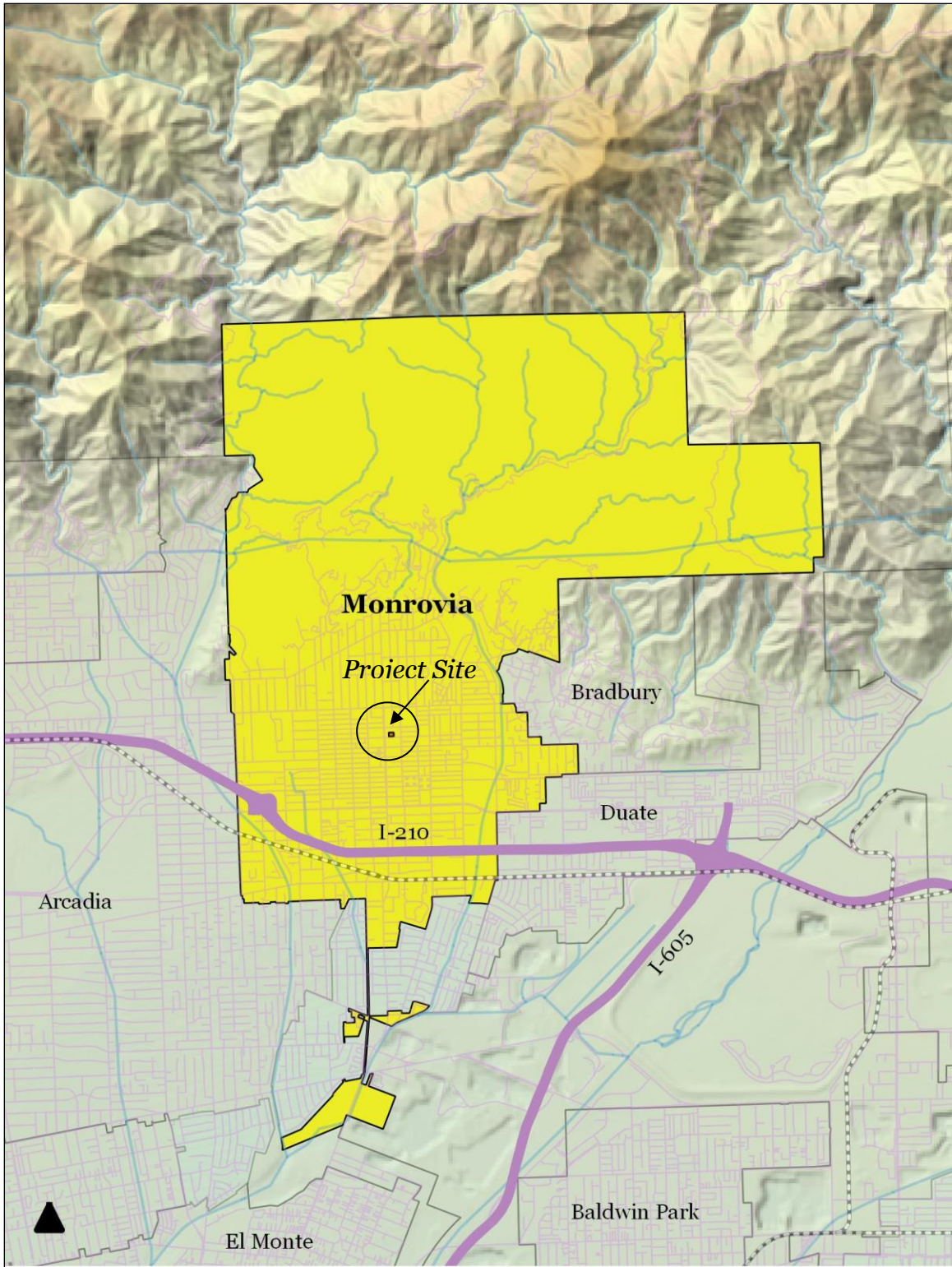


EXHIBIT 2-2
CITYWIDE MAP
Source: Quantum GIS

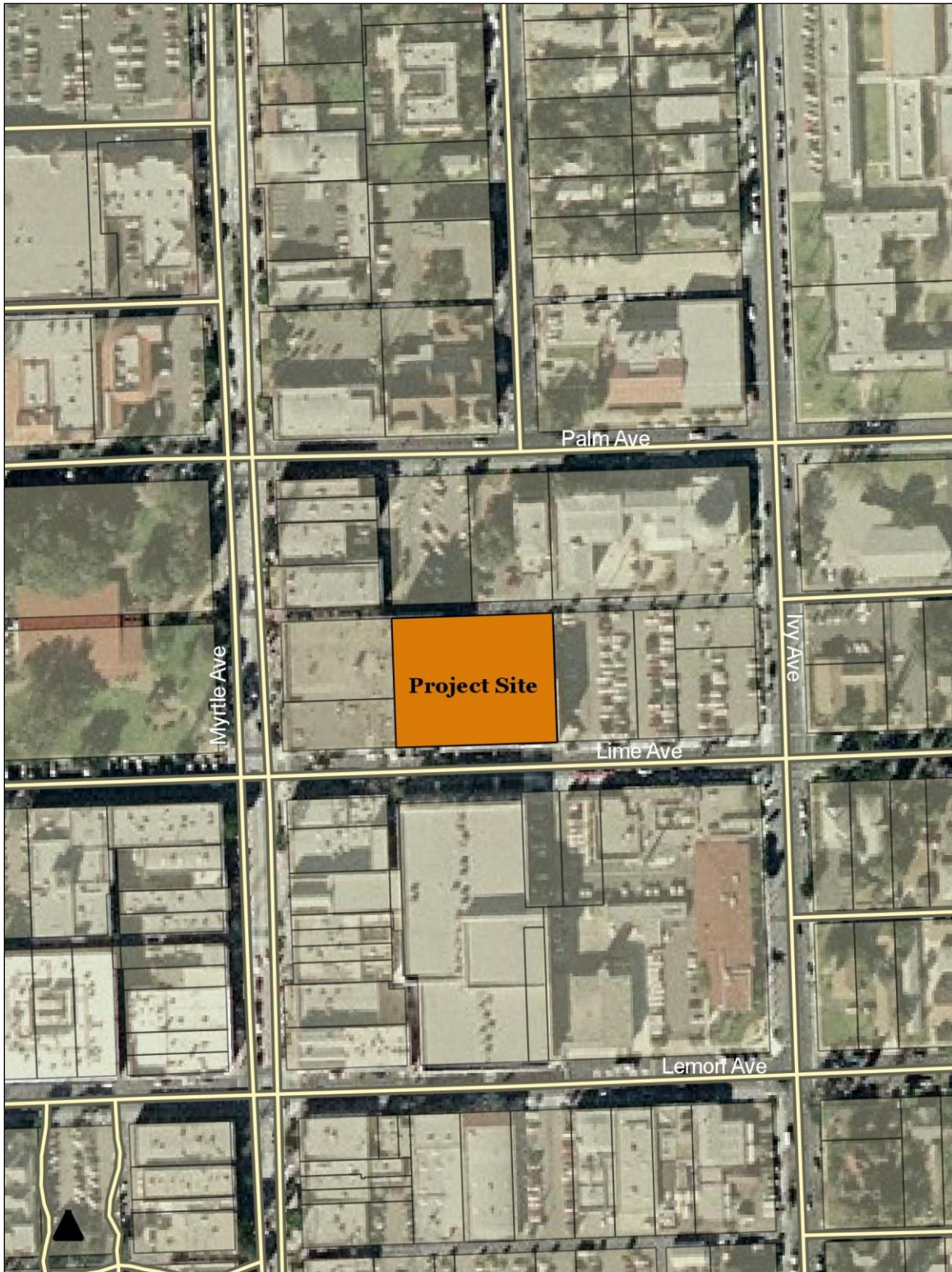


EXHIBIT 2-3
LOCAL MAP
Source: Quantum GIS

2.3 ENVIRONMENTAL SETTING

The existing three- and four-story building is located within the City of Monrovia on the north side of Lime Avenue in the central business district of downtown “Old Town” Monrovia. The project site and the adjacent properties are fully urban. The project site is currently zoned Public/Quasi-Public (P/QP). The properties located north of the site are zoned for Public/Quasi-Public (P/QP) and High Density Residential, while the properties located to the south Public/Quasi-Public (P/QP) and Planned Development. The uses located west of the site are zoned Neighborhood Commercial (NC). Finally, the properties located to the east are zoned Public/Quasi-Public (P/QP). The zoning and General Plan land use designations for the site and surrounding uses are shown in Exhibits 2-4 and 2-5. Additionally, an aerial photograph depicting the project site and the immediate area and a photograph of the project site are also provided in Exhibit 2-6. The surrounding land uses and development are described in detail below:

- *North of the site.* A variety of land uses and development, including a private school, a church, surface parking, and retail uses, are located north of the project site. These uses are separated from the project site by an alley that extends along the north side of the site in an east to west orientation. The existing private school, the Boys Republic School for Boys, is located at 128 East Palm Avenue, #102. The United Methodist Church of Monrovia is located next door to the private school at 128 East Palm Avenue, #104. Finally, a parking lot located to the rear serves a number of commercial businesses with frontage on South Myrtle Avenue.
- *South of the site.* Lime Avenue extends along the south side of the project site in an east to west orientation. Studio Movie Grill (SMG) is located on the south side of Lime Avenue, opposite the project site. In addition, the Monrovia Police Department and City Hall are located southeast of the project site on the southwest corner of Ivy Avenue and Lime Avenue.⁵
- *East of the site.* A public parking lot abuts the site to the east. This lot is located at the northwest corner of the Ivy Avenue and Lime Avenue intersection.⁶ The First Indonesian Baptist Church and the accompanying parking lot is located further east on the east side of Ivy Avenue. An older historic residential neighborhood is generally located east of Ivy Avenue.
- *West of the site.* Various commercial uses abut the project site to the west.⁷ These uses occupy frontage along the east side of Myrtle Avenue. These commercial establishments include, from north to south, D-Drive (324 South Myrtle Avenue), Old Town Pizza (338 South Myrtle Avenue), and Seasoning Alley (342 South Myrtle Avenue).⁸

⁵ Google Earth. Website Accessed March 1, 2019.

⁶ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

⁷ Ibid.

⁸ Google Earth. Website Accessed March 1, 2019.

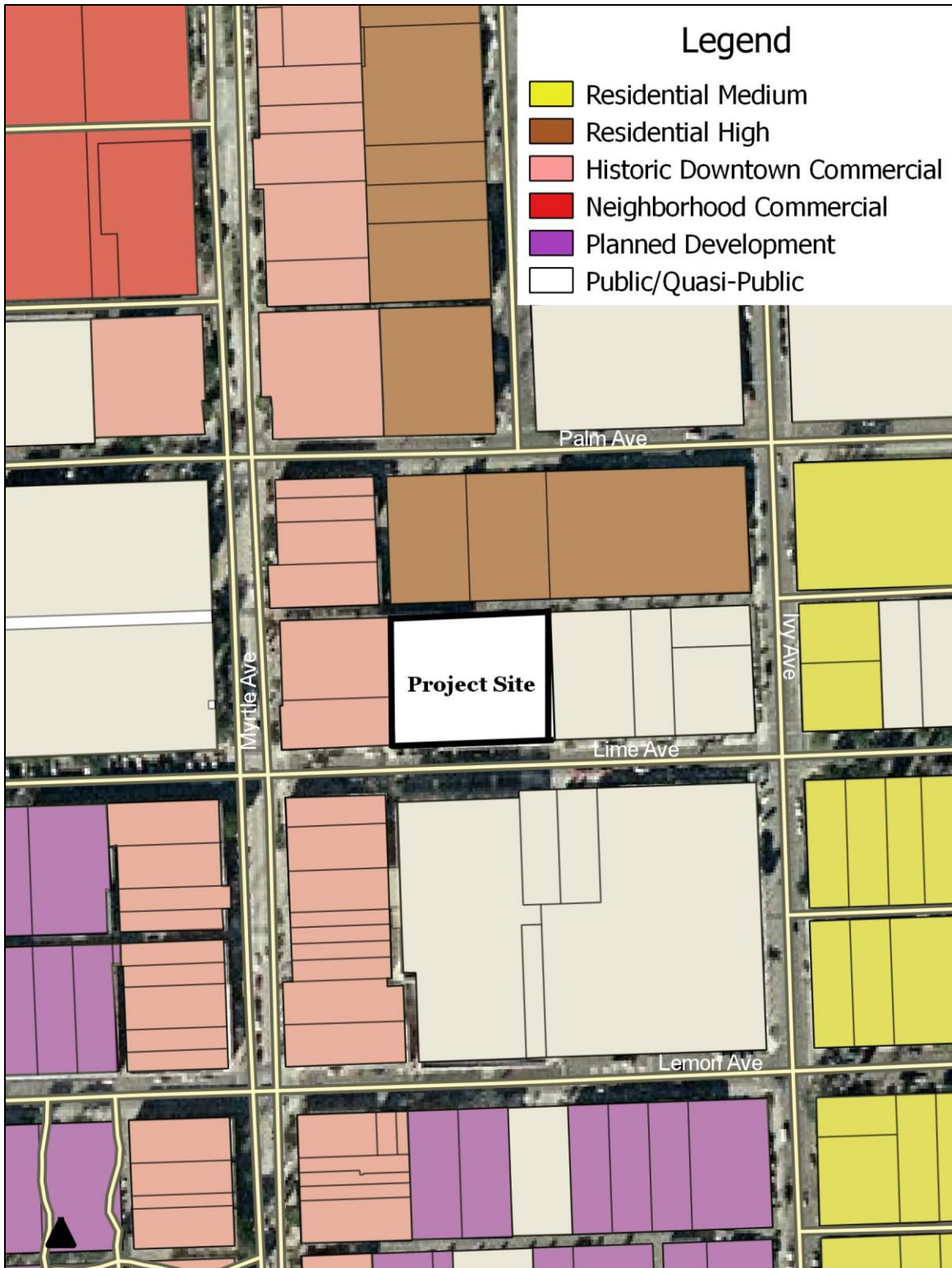


EXHIBIT 2-4 ZONING MAP

SOURCE: CITY OF MONROVIA AND QUANTUM GIS

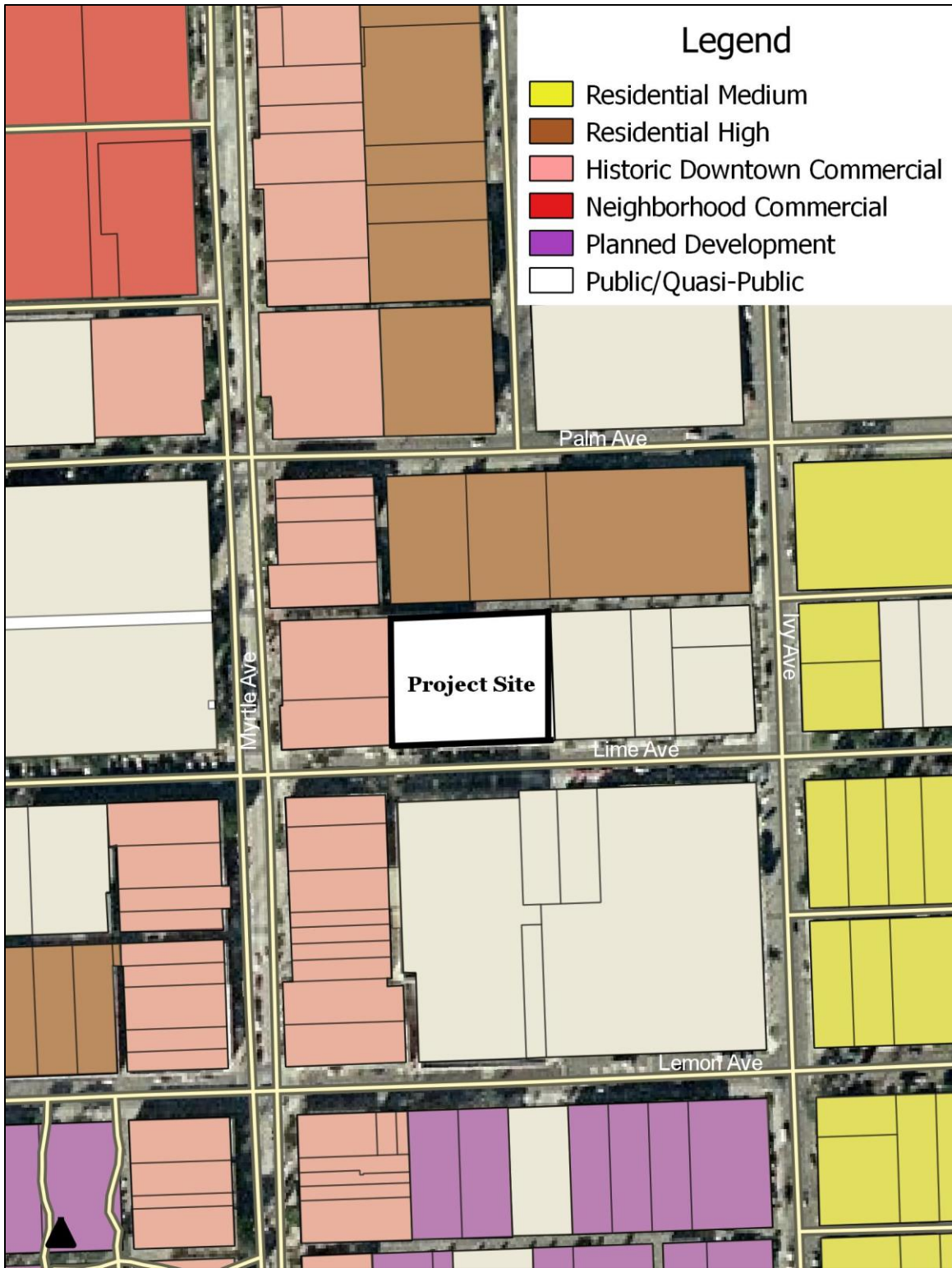


EXHIBIT 2-5
GENERAL PLAN LAND USE MAP
SOURCE: CITY OF MONROVIA AND QUANTUM GIS

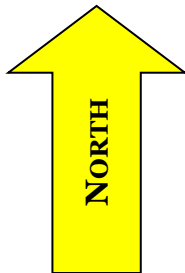


EXHIBIT 2-6
AERIAL PHOTOGRAPH
Source: Google Earth

The existing building has a total floor area of 92,249 square feet. This building has historically been occupied by telecommunication businesses including General Telephone, Pacific Bell, Verizon, and most recently Frontier Communications.

2.4 PROJECT DESCRIPTION

2.4.1. PHYSICAL CHARACTERISTICS

The proposed project, if approved, will involve a number of interior modifications and exterior improvements to an existing commercial building located in the City's downtown business district (Old Town). The existing building will undergo remodeling to accommodate the proposed self storage use and the ground floor commercial uses. The proposed project will consist of the following elements:⁹

- *Project Site.* The proposed project will be redeveloped on a 0.73-acre (31,799 square feet) site located along the north side of Lime Avenue. The site consists of three parcels: 8516-01-2800, 8516-01-2801, and 8516-01-2802. The site has a lot depth (north to south) of 160 feet and a lot width (east to west) of 200 feet.
- *Building Overview.* The proposed project will utilize the existing building. Of the total amount of floor area that is provided, 85,756 square feet will consist of self storage space and 5,520 square feet will consist of commercial space and commercial hallway. This building encompasses 92,249 square feet and contains four floors and a basement. In addition, the building has a floor area ratio (FAR) of 2.90 to 1.0. A total of 668 storage units will be provided.
- *First Floor.* The first floor will total 19,863 square feet and will contain 5,520 square feet of commercial space (4,536 square feet) and commercial hallway (984 square feet), and 13,370 square feet of storage space. The first floor will contain 90 storage units. A total of four commercial units will be provided (referred to herein as Unit 1 through 4). Unit 1 will have a total floor area of 1,334 square feet; Unit 2 will have a total floor area of 796 square feet; Unit 3 will have a total floor area of 977 square feet; and Unit 4 will have a total floor area of 1,429 square feet.
- *Second Floor.* The second floor will consist of 21,146 square feet. The second floor will contain 167 storage units.
- *Third Floor.* The third floor will consist of 21,146 square feet. The third floor will contain 167 storage units.
- *Fourth Floor.* The fourth floor will consist of 9,088 square feet. The fourth floor will contain 81 storage units.
- *Basement.* The basement will consist of 21,006 square feet. The basement will contain 163 storage units.

⁹ KSP Studio. *Conceptual Site Plan*. Plan dated May 20, 2019.

- *Parking and Access.* Access to the proposed project will be provided by a 30-foot wide driveway located along the south side of the adjacent alley. A total of 19 parking spaces including two spaces compliant with the American’s with Disabilities Act (ADA) will be provided. In addition, the proposed project will provide ten bicycle parking spaces.

The proposed project is summarized in Table 2-1 shown below and on the following pages. The proposed project’s conceptual site plan is shown in Exhibit 2-5. Conceptual elevations are provided in Exhibit 2-6.

**Table 2-1
 Project Summary Table**

Project Element	Description
Site Area	0.73 acres (31,799 sq. ft.)
Total Building Area	92,249 sq. ft.
Storage Space	85,756 sq. ft.
Commercial Space	4,536 sq. ft.
Commercial Hallway	984 sq. ft.
Management Office Space	973 sq. ft.
Total No. of Storage Units	668 storage units
Floor Area - First Floor	19,863 sq. ft.
Floor Area - Second Floor	21,146 sq. ft.
Floor Area - Third Floor	21,146 sq. ft.
Floor Area - Fourth Floor	9,088 sq. ft.
Floor Area - Basement	21,006 sq. ft.
No. of Storage Units - First Floor	90 storage units
No. of Storage Units - Second Floor	167 storage units
No. of Storage Units - Third Floor	167 storage units
No. of Storage Units - Fourth Floor	81 storage units
No. of Storage Units - Basement	163 storage units
Floor Area - Commercial Unit 1	1,334 sq. ft.
Floor Area - Commercial Unit 2	796 sq. ft.
Floor Area - Commercial Unit 3	977 sq. ft.
Floor Area - Commercial Unit 4	1,429 sq. ft.
Lot Coverage	62%
FAR	2.90 to 1.0
Parking Spaces	19 stalls

Source: KSP Studio. *Conceptual Site Plan.*

2.4.2. CONSTRUCTION CHARACTERISTICS

The proposed project will utilize the existing on-site building. The building and parking area renovations are estimated to last for approximately seven months and will include the remodeling of the building’s interior and exterior, the addition of new landscaping, the inclusion of new parking spaces, and the installation of new fencing. The building’s façade will be updated and new signage will be installed. Minor grading done at a superficial level will be performed and the Applicant may need to cut portions of the asphalt to lay down water lines or electrical lines for the new lighting.

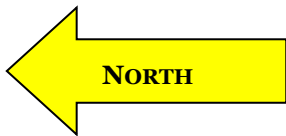
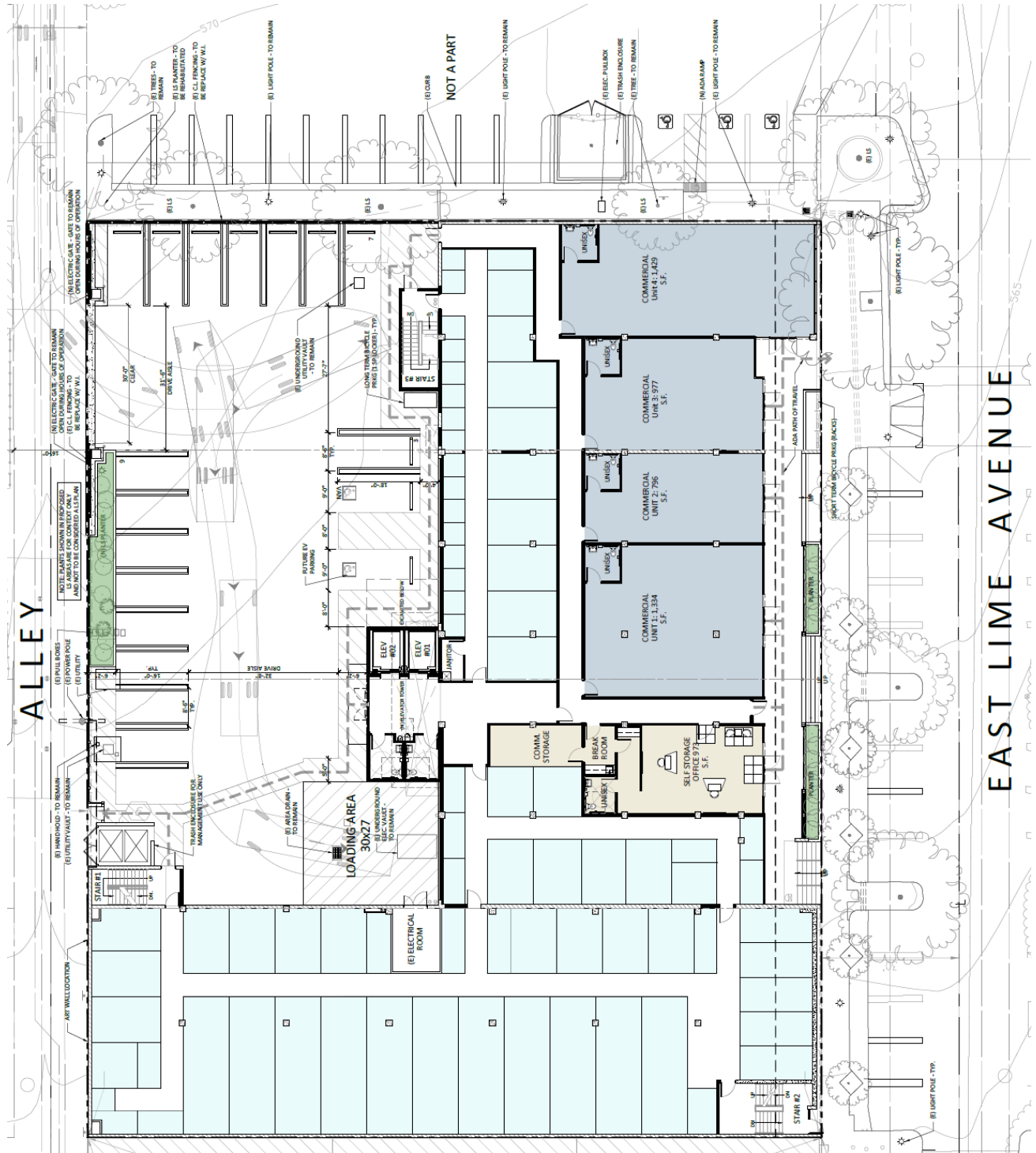
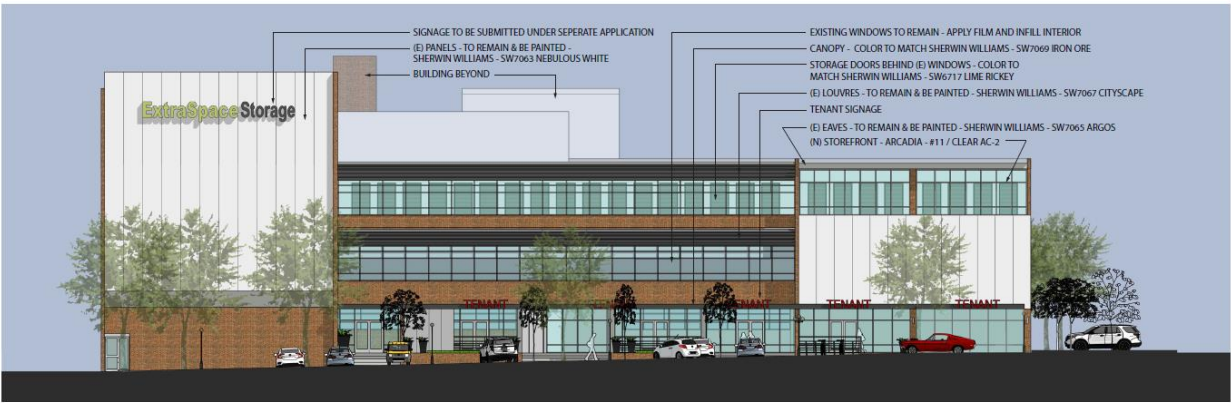


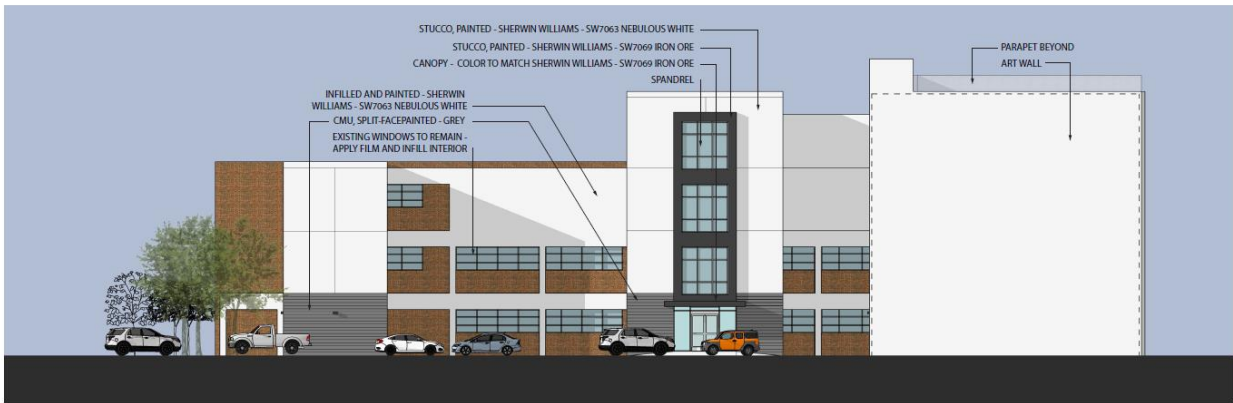
EXHIBIT 2-5
CONCEPTUAL SITE PLAN
 Source: KSP Studio



PROPOSED SOUTH ELEVATION



PROPOSED EAST ELEVATION



PROPOSED NORTH ELEVATION

EXHIBIT 2-6
CONCEPTUAL ELEVATIONS
 Source: KSP Studio

2.4.3. OPERATIONAL CHARACTERISTICS

The self storage facility leasing office will be open from 9:00 AM to 6:00 PM Monday through Saturday and 10:00 AM to 5:00 PM on Sunday, with an on-site manager, who will be an employee of the storage facility. This facility will employ approximately five employees, although no more than two employees will be on-site at any given time.¹⁰ Each storage unit will be individually alarmed and the entire facility will be monitored by 24-hour surveillance cameras. In addition, computer coded gate access will control who can enter the facility.

The tenants that will occupy the four commercial units are not yet known. In addition, the hours of operation cannot be determined until a tenant has been found. The commercial component of the proposed project is estimated to add 18 new jobs based on a ratio of 25.76 employees per acre.¹¹ Thus, the proposed project's overall employment generation is estimated to be 23 new jobs.

As indicated previously, the existing building's previous tenants consisted of telecommunication businesses including General Telephone, Pacific Bell, Verizon, and most recently Frontier Communications. The building served as office space for the aforementioned companies. Assuming a ratio of 25.76 employees per acre, the building's previous tenants could have employed over 50 employees at any given time, which would have contributed to higher trip generation and utilities consumption rates.

2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Monrovia) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project will require the approval of the following discretionary actions:

- A *General Plan Amendment* (including new land use development standards which are also discussed herein in Section 3.11) to change the site's land use designation from Public/Quasi-Public (P/QP) to Planned Development (Area PD-5b);
- A *Zone Change* to change the site's zoning from Public/Quasi-Public (P/QP) to Planned Development (PD-5b);
- A *Tentative Parcel Map* to consolidate three parcels into one lot;
- A *Conditional Use Permit* to allow for a self-storage use; and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

The project Applicant will also be required to apply for all demolition, grading, building permits, and permits for new utility connections.

¹⁰ Based on a ratio of 0.06 employees per 1,000 square feet derived from the SANDAG.

¹¹ The Natelson Company, Inc. *Employment Density Study Summary Report*. October 31, 2001.

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SECTION 3.0 ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

- Aesthetics (Section 3.1);
- Agriculture and Forestry Resources (Section 3.2);
- Air Quality (Section 3.3);
- Biological Resources (Section 3.4);
- Cultural Resources (Section 3.5);
- Energy (Section 3.6);
- Geology and Soils (Section 3.7);
- Greenhouse Gas Emissions (Section 3.8);
- Hazards and Hazardous Materials (Section 3.9);
- Hydrology and Water Quality (Section 3.10);
- Land Use and Planning (Section 3.11);
- Mineral Resources (Section 3.12);
- Noise (Section 3.13);
- Population and Housing (Section 3.14);
- Public Services (Section 3.15);
- Recreation (Section 3.16);
- Transportation (Section 3.17);
- Tribal Cultural Resources (Section 3.18);
- Utilities and Service Systems (Section 3.19);
- Wildfire (Section 3.20); and,
- Mandatory Findings of Significance (Section 3.21).

The analysis considers both the short-term (construction-related) and long-term (operational) impacts associated with the proposed project's implementation, and where appropriate, the cumulative impacts. To each question, there are four possible responses:

- *No Impact.* The proposed project will not result in any adverse environmental impacts.
- *Less than Significant Impact.* The proposed project may have the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Monrovia or other responsible agencies consider to be significant.
- *Less than Significant Impact with Mitigation.* The proposed project may have the potential to generate a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of the recommended mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant. This finding will require the preparation of an environmental impact report (EIR).

3.1 AESTHETICS

3.1.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project, except as provided in Public Resources Code Section 21099, have a substantial adverse effect on a scenic vista? • Less than Significant Impact.*

The proposed project is a request to adaptively reuse an existing commercial building. The existing building has a maximum height of 58 feet and consists of three to four stories. The dominant physiographic feature in the area includes the San Gabriel Mountains, which are located approximately one mile north of the project site. Views of these mountains facing north from Lime Avenue are obstructed by existing development. In addition, views of these mountains facing north from the alley that abuts the site to the north are obstructed by the existing streetscape and development.¹² Therefore, the proposed project's implementation will not result in a loss of views since the proposed project will essentially reuse the existing building envelope. As a result, less than significant impacts will occur.

- B. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? • No Impact.*

According to the California Department of Transportation (Caltrans), the nearby streets including Foothill Boulevard, Myrtle Avenue, and Lime Avenue are not a designated scenic highway.¹³ In addition, the project site does not contain any scenic rock outcroppings.¹⁴ Lastly, the project site does not contain any buildings listed in the State or National register (refer to Section 3.5). As a result, no impacts will occur.

- C. *Would the project's location, in a 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 publically accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact.*

The proposed project is a request to adaptively reuse an existing commercial building. The existing building design consists of Mid-Century Modern architecture. The building's exterior façade consists of brick, concrete, and aluminum louvers. The building's exterior façade will remain intact, though new paint will be applied to the aluminum louvers, the canopy, eaves, and concrete panels. It is important to note that although this building was constructed in 1954, it is not a historic building. It is also not located within a historic district.

While the project site does not occupy frontage on Myrtle Avenue, the project site is located within the

¹² Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

¹³ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov

¹⁴ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

Old Town Monrovia district. The reuse of the existing building is consistent with the vision stated above. In addition, the proposed project is consistent with the following General Plan policy:

- *Policy 9.6:* Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.

The proposed project's implementation will not degrade scenic resources since it will revitalize an aging building. In addition, views of the San Gabriel Mountains are presently obstructed by the surrounding development. As a result, no impacts to scenic resources will occur and the proposed project's implementation will not conflict with goals and policies identified to protect and enhance scenic resources.

D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • Less than Significant Impact.

Light and glare is regulated under Chapter 17.32 – Performance Standards of the City's Municipal Code. According to Section 17.32.080, lighting where provided to illuminate private property shall be so arranged as to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment.

Lighting

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. There are light sensitive residential uses located approximately 320 feet east of the project site.

Future sources of light emanating from the project site will continue to include vehicular headlights, interior lighting, and exterior lighting including street lamps and wall packs. New lighting will include five LED wall packs that will be installed along the building's western and northern elevations; three LED area lighting that will be installed within the parking areas along the project site's northern and eastern property lines; and four six-inch recessed down lights located along the building's northern elevation.¹⁵

The proposed project, like all new developments in the City, is subject to the aforementioned Code regulations. The lighting that will be provided will illuminate the parking lot areas and is not expected to negatively affect the residential units located along the east side of Ivy Avenue. As a result, less than significant impacts will occur.

Glare

¹⁵ KSP Studio. *Conceptual Site Plan*. Plan dated May 20, 2019.

Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it will adversely affect sensitive land use or driver's vision. As indicated previously, glare is regulated in Chapter 17.32 of the City's Municipal Code. According to Section 17.32.090, no direct or reflected glare, whether produced by floodlight, high temperature processes such as combustion or welding, or other processes, so as to be visible from the boundary line of property on which the same is produced, shall be permitted. Sky-reflected glare from buildings or game courts shall be so controlled by such reasonable means as are practical to the end that the sky-reflected glare will not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs.

The exterior façade surfaces will consist of non-reflective materials, such as brick and concrete. The windows will remain, though a film will be applied to tint the windows. This film will be able to reduce or eliminate reflective glare. As a result, less than significant glare-related impacts will occur.[A1]

3.1.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding aesthetics will result from the proposed project's implementation. As a result, no mitigation is required.

3.2 AGRICULTURE & FORESTRY RESOURCES

3.2.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? • No Impact.*

According to the California Department of Conservation, the City of Monrovia does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.¹⁶ The entire City is urban and there are no areas within the City that are classified as "Prime Farmland." Since implementation of the proposed project will not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur.

B. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract? • No Impact.*

The project site is currently zoned Public/Quasi-Public (P/QP). According to Chapter 17.08 (Permitted Uses) of Title 17 Zoning of the Monrovia Municipal Code, agricultural uses are not listed as permitted uses within the P/QP Zone.¹⁷ Therefore, the proposed project's implementation will not conflict with zoning for agricultural uses since they are not permitted within the P/QP Zone. In addition,

¹⁶ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *Important Farmland in California 2010*. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2010/fmmp2010_08_11.pdf.

¹⁷ City of Monrovia Municipal Code. *Title 17 – Zoning, Chapter 17.08 (Permitted Uses)*. Site accessed April 16, 2019.

according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.¹⁸ As a result, no impacts on existing or future Williamson Act Contracts or land zoned for agricultural uses will result from the proposed project's implementation.

C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? • *No Impact.*

The City of Monrovia and the project site are located in the within a larger urban area. No forest lands are located within the downtown portion of the City or in the vicinity of the project site. As a result, no impacts on forest land or timber resources will result from the proposed project's implementation.

D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use? • *No Impact.*

No forest lands are located within the downtown portion of the City of Monrovia or in the vicinity of the project site. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation and thus, no impacts will occur.

E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? • *No Impact.*

The proposed project will not involve the disruption or damage of the existing environment that results in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is not located in close proximity to farm land or forest land. As a result, no impacts will result from the proposed project's implementation.

3.2.2 MITIGATION MEASURES

The preceding analysis determined that no impacts to agriculture and forestry resources will result from the proposed project's implementation. As a result, no mitigation is required.

3.3 AIR QUALITY

¹⁸ California Department of Conservation. *State of California Williamson Act Contract Land*. ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf

An Air Quality and Noise Study dated June 11th, 2019 was prepared by Blodgett Baylosis Environmental Planning. The tables and analysis presented in the aforementioned Study were incorporated into this Section verbatim. This Air Quality and Noise Study, including the ancillary CalEEMod Worksheets, can be found under Appendix A of this IS/MND.

3.3.1 ENVIRONMENTAL SETTING

Significance Thresholds

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.
- *Nitrogen dioxide (NO₂)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO₂ is formed when nitric oxide (a pollutant from internal combustion) combines with oxygen.
- *Sulfur dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *PM₁₀ and PM_{2.5}* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Construction Emissions

Projects in the South Coast Air Basin (SCAB) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

Operational Emissions

A project will have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

3.3.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? • Less than Significant Impact.*

The project site is located within the South Coast Air Basin, which covers a 6,600 square-mile area within Los Angeles, the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County.¹⁹ Measures to improve regional air quality are outlined in the SCAQMD's Air Quality Management Plan (AQMP).²⁰ The most recent AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).²¹ The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Key elements of the 2016 AQMP include enhancements to existing programs to meet the 24-hour PM_{2.5} Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM_{2.5} and ozone.

Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP: *Consistency Criteria 1* refers to a project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation and *Consistency Criteria 2* refers to a project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.²²

Criteria 1

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact. Refer to the analysis included in the next

¹⁹ South Coast Air Quality Management District, *Final 2016 Air Quality Plan*. Adopted March 2017.

²⁰ Ibid.

²¹ Ibid.

²² South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2. In addition, the proposed project's operational emissions will be well within the emissions projections identified in the most recent AQMP. As shown in Table 3-5 of the Final 2016 AQMP, the future 2031 daily operational emissions of the entire City of Monrovia *with* the estimated population, employment, and VMT growth projections are estimated to be: 345 tons per day of VOCs; 214 tons per day of NOx; 1,188 tons per day of CO; 18 tons per day of SOx; and 65 tons per day of PM_{2.5}. The proposed project's operational emissions will be well within the emissions projections estimated in the 2016 AQMP.

Criteria 2

The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of Monrovia. Projects that are consistent with the projections of employment and population forecasts identified in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Monrovia is projected to add a total of 3,600 new jobs through the year 2040.²³

The proposed project will result in a potential employment generation of up to 23 new jobs. The self storage component will employ approximately five employees, though no more than two employees will be on-site at any given time.²⁴ The tenants that will occupy the commercial units are not yet known. In addition, the hours of operation cannot be determined until a tenant has been found. The commercial component of the proposed project is estimated to add an estimated 18 new jobs based on a ratio of 25.76 employees per acre.²⁵ The projected number of new jobs is well within SCAG's employment projections for the City of Monrovia and the proposed project will not violate Consistency Criteria 2. Since the proposed project will not be in violation of either Consistency Criteria, the proposed project's impacts are less than significant.

B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? • Less than Significant Impact.

²³ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

²⁴ Based on a ratio of 0.06 employees per 1,000 square feet derived from the SANDAG.

²⁵ The Natelson Company, Inc. *Employment Density Study Summary Report.* October 31, 2001.

The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2) developed for the SCAQMD (these worksheets are provided under Appendix A). The proposed project’s construction will include minor interior demolition, site preparation, minor interior construction, and finishing activities (paving, painting, and the planting of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4.2.

The remodeled building will include 85,756 square feet of self storage space and 973 square feet of self storage office space, for a total of 86,729 square feet dedicated to self-storage uses. Four ground-level commercial tenant spaces and a commercial hallway (totaling 5,520 square feet) not related to the self storage use will also be provided. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative. In order to be consistent with the Traffic Memorandums, 86,729 square feet dedicated to self-storage uses and 5,520 square feet of commercial space (including the 984 square feet commercial hallway) was analyzed in the CalEEMod. As shown in Table 3-1, daily construction emissions will not exceed the SCAQMD’s significance thresholds.

**Table 3-1
Estimated Daily Construction Emissions**

Construction Phase	ROG	NO₂	CO	SO₂	PM₁₀	PM_{2.5}
Demolition (on-site)	2.29	22.67	14.89	0.02	1.28	1.20
Demolition (off-site)	0.06	0.04	0.58	--	0.14	0.03
Total Demolition	2.29	22.71	15.47	0.02	1.42	1.23
Site Preparation (on-site)	1.75	21.53	11.91	0.02	1.33	0.83
Site Preparation (off-site)	0.03	0.02	0.35	--	0.09	0.02
Total Site Preparation	1.78	21.55	12.26	0.02	1.42	0.85
Grading (on-site)	2.92	33.41	16.01	0.03	13.89	8.08
Grading (off-site)	0.17	0.12	1.61	--	0.75	0.19
Total Grading	3.09	33.53	17.62	0.03	14.64	8.27
Building Construction (on-site)	2.44	19.01	16.60	0.02	1.04	1.00
Building Construction (off-site)	0.44	3.37	3.85	0.01	1.93	0.51
Total Building Construction	2.88	22.38	20.45	0.03	2.97	1.51
Paving (on-site)	1.15	11.58	11.80	0.01	0.65	0.60
Paving (off-site)	0.06	0.04	0.61	--	0.16	0.04
Total Paving	1.21	11.62	12.41	0.01	0.81	0.64
Architectural Coatings (on-site)	20.12	1.68	1.83	--	0.11	0.11
Architectural Coatings (off-site)	0.07	0.04	0.65	--	0.33	0.08
Total Architectural Coatings	20.19	1.72	2.48	--	0.44	0.19
Maximum Daily Emissions	20.20	33.53	20.46	0.04	14.64	8.27
Daily Thresholds	75	100	550	150	150	55

The proposed project’s construction will be required to adhere to all SCAQMD regulations related to fugitive dust generation and other construction-related emissions. A majority of the proposed project’s construction will occur indoors. Outdoor construction will be limited to the application of exterior paint,

repaving of the rear parking area, the addition of new landscaping, and the installation of new fencing on the east side of the property. Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed, is operational, and continue over the operational life of the proposed project.

The long-term air quality impacts associated with the proposed project include mobile emissions associated with vehicular traffic. The analysis of long-term operational impacts also used the CalEEMod computer model. As indicated in Table 3-2, the projected long-term emissions will also be below thresholds of significance. As indicated previously, 86,729 square feet dedicated to self-storage uses and 5,520 square feet of commercial space (including the 984 square feet commercial hallway) was analyzed in the CalEEMod computer model. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative.

**Table 3-2
 Estimated Operational Emissions in lbs/day - Unmitigated**

Emission Source	ROG	NO₂	CO	SO₂	PM₁₀	PM_{2.5}
Area-wide (lbs/day)	2.06	--	--	--	--	--
Energy (lbs/day)	--	0.03	0.03	--	--	--
Mobile (lbs/day)	0.41	2.13	5.91	0.02	1.76	0.48
Total (lbs/day)	2.47	2.16	5.95	0.02	1.76	0.48
Daily Thresholds	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: California Air Resources Board CalEEMod [computer program].

As indicated in Table 3-2, the projected long-term emissions are below thresholds considered to represent a significant impact. As a result, no mitigation is required beyond the standard regulations required by the SCAQMD, and the impacts will be less than significant.

C. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact with Mitigation.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.²⁶ These population groups are generally more sensitive to poor air quality. The nearest sensitive receptors to the project site include the United Methodist Church located 140 feet to the northeast of the project site (refer to Exhibit 3-1). This aforementioned receptor is located along the west side of Ivy Avenue.

²⁶ South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.



EXHIBIT 3-1
NEARBY SENSITIVE RECEPTORS
SOURCE: QUANTUM GIS

The SCAQMD requires that CEQA air quality analyses indicate whether a project will result in an exceedance of *localized emissions thresholds* or LSTs. LSTs apply to short-term (construction) emissions at a fixed location and do not include off-site or regional emissions. The approach used in the analysis of the proposed project utilized a number of screening tables that identified maximum allowable emissions (in pounds per day) at a specified distance to a receptor. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO₂; carbon monoxide (CO) emissions from construction; PM₁₀ emissions from construction; and PM_{2.5} emissions from construction. The use of the “look-up tables” is typically used for projects proposed on less than five acres of land area. The project site consists of 0.73 acres. Therefore, for the purposes of the LST analysis, the receptor distance used was 50 meters (roughly 140 feet). The proposed project’s LST emissions are shown in Table 3-3.

**Table 3-3
Local Significance Thresholds Exceedance SRA 9 for 1-Acre of Disturbance**

Emissions	Proposed Project	Type	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO _x	33.53	Construction	89	112	159	251	489
CO	20.46	Construction	623	945	1,914	4,803	20,721
PM ₁₀	7.12*	Construction	5	14	34	75	199
PM _{2.5}	4.22*	Construction	3	5	9	22	94

Source: CalEEMod Version 2016.3.2.

* = Note: These figures take into account the water of the site up to three times per day, which is a standard condition required by the SCAQMD.

As indicated in Table 3-3, the emissions generated by the construction of the proposed project will not exceed the LSTs identified above.

The proposed project will be a remodel of the existing on-site building. Due to the age of the buildings on-site, Asbestos Containing Materials (ACM) may be present and may be released during the interior construction and demolition activities in the absence of mitigation. An Asbestos and Lead Based Paint Survey was conducted for the proposed project by Ardent. The results of the survey were summarized in a report dated December 20, 2018, which is provided in Appendix B. The results of the asbestos survey indicate that ACM and Asbestos Containing Construction Materials (ACCM) are present in the building. The EPA and State of California specify that ACM and ACCM classified as friable, or that could become friable during demolition, are to be removed prior to demolition activities.²⁷

According to the EPA, non-friable ACM or ACCM represents a minimal hazard to the occupants of a building as long as the material is in a generally undamaged condition and used for its intended purpose. The National Emission Standards for Hazardous Air Pollutants (NESHAPs) require that both friable and non-friable ACM that could become friable be removed prior to renovation or demolition of buildings. The State of California Department of Occupational Safety and Health requires that friable and non-friable ACCM be removed prior to disturbance. As a result, mitigation measure No. 1 is required.²⁸ In

²⁷ Ardent Environmental Group, Inc. *Asbestos and Lead Based Paint Survey*. Report dated December 20, 2018.

²⁸ Ardent Environmental Group, Inc. *Asbestos and Lead Based Paint Survey*. Report dated December 20, 2018.

addition, standard City conditions have been added later in this section with the identified mitigation measure. The removal of lead based paint and/or asbestos containing materials will also be done in accordance with SCAQMD Rule 1403-Asbestos Emissions from Demolition/Renovation Activities. Therefore, the proposed project’s interior renovations will not affect the nearby sensitive receptors since ACM removal will be done in accordance with SCAQMD guidelines.

An analysis of construction diesel particulate matter (DPM) was performed although the proposed project will involve only minor interior and exterior alterations. Heavy construction equipment that consumes diesel fuel and produces DPM emissions will be in limited use indoors. Outdoor construction will involve façade improvements, the installation of new lighting, new landscaping, exterior painting, and repaving. The construction and installation of these improvements will occur over a limited duration. In addition, the closest sensitive receptors include the United Methodist Church, located 140 feet to the northeast of the project site.

Work done in the parking areas may require the use of a single backhoe, though medium sized trucks will travel to the site carrying construction materials and workers. An analysis of mobile source emissions was performed for idling trucks, trucks travelling to the project site, and for backhoe operations. The 2017 EMFAC emissions factors for LHD2 vehicles, or Light-Heavy-Duty trucks weighing no more than 14,000 pounds, were utilized in order to perform the analysis for construction trucks. Meanwhile, the emission factors from backhoes were derived from the SCAQMD. Construction vehicles will use the existing alley located along the site’s northern boundary. These vehicles will travel approximately 275 feet from the alley’s connection with Ivy Avenue to the project site, or a distance of 0.05 miles, at average speed of ten miles per hour. According to the CalEEMod, there will be no more than 38 workers on-site at a time. Assuming five workers per truck, there will be the potential for up to eight trucks carrying passengers. Table 3-4 shown below depicts the estimated mobile source emissions during construction. As shown in the table, the proposed project’s construction will result in negligible construction emissions.

**Table 3-4
Mobile Source Emissions from Construction Equipment**

Pollutants	Emissions Factors	Number of Hours	Distance in miles	Number of Vehicles	Emissions
PM Exhaust during Operations (pounds/hour)	0.0160	8	--	1	0.128 pounds per day
PM10 Exhaust at Idle (grams/vehicle/day)	0.27616843	--	--	8	2.20 grams per day, or 0.004 pounds per day
PM10 Exhaust at 10 mph (grams/mile)	0.030146605	--	0.10	8	0.24 grams per day, or 0.0005 pounds per day
PM2.5 Exhaust at Idle (grams/vehicle/day)	0.02642215	--	--	8	0.21 grams per day, or 0.0004 pounds per day
PM2.5 Exhaust at 10 mph (grams/mile)	0.028842476	--	0.10	8	--

Source: 2017 EMFAC Factors

Once operational, a single loading door will be provided along the building’s north facing elevation. This loading door will only have capacity to accommodate one truck at a time. Furthermore, the type of use

that is proposed (self-storage and commercial) generally does not involve the utilization of large trucks. The trucks that will travel to the site will consist of smaller trucks similar to U-Haul vehicles. These trucks typically consume regular unleaded gasoline and will have an average length of 20 feet. An analysis of mobile source emissions was performed for idling U-Haul type vehicles and similar vehicles travelling to the site. The 2017 EMFAC emissions factors for LHD2 vehicles, or Light-Heavy-Duty trucks weighing no more than 14,000 pounds, were utilized in order to perform the analysis. These trucks will use the existing alley located along the site’s northern boundary and will travel approximately 275 feet from the alley’s connection with Ivy Avenue to the project site, or a distance of 0.05 miles, at average speed of ten miles per hour. As stated herein in Section 3.17.A, the self-storage portion of the proposed project will result in 131 trips per day. Assuming ten percent of those trips consist of U-Haul vehicles, there may be up to 13 U-Haul trips per day to the site. Table 3-5 shown below depicts the estimated mobile source emissions from future U-Haul trucks. As shown in the table, the proposed project’s operation will result in negligible emissions.

**Table 3-5
 Mobile Source Emissions from U-Haul vehicles**

Pollutants	Emissions Factors	Distance in miles	Number of U-Haul Vehicles	Emissions
PM10 Exhaust at Idle (grams/vehicle/day)	0.0	--	13	--
PM10 Exhaust at 10 mph (grams/mile)	0.000454526	0.10	13	--
PM2.5 Exhaust at Idle (grams/vehicle/day)	0.0	--	13	--
PM2.5 Exhaust at 10 mph (grams/mile)	0.00041792	0.10	13	--

Source: 2017 EMFAC Factors

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as *hot-spots*. Three variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. Typically, a CO hot-spot may occur near a street intersection that is experiencing severe congestion (a LOS E or LOS F) where idling vehicles result in ground level concentrations of carbon monoxide. However, within the last decade, decreasing background levels of pollutant concentrations and more effective vehicle emission controls have significantly reduced the potential for the creation of hot-spots. The SCAQMD stated in its CEQA Handbook that a CO hot-spot will not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new vehicle emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions. As a result, with the aforementioned Standard Conditions and mitigation measure No. 1, the impacts will be less than significant.

D. Would the project result in other emissions (such as those leading to odors) adversely affecting a

substantial number of people? • Less than Significant Impact.

The SCAQMD has identified land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.²⁹ The proposed project involves the operation of a self storage facility and four commercial tenants. Given the nature of the proposed use, no impacts related to odors will occur with the proposed project. In addition, the project site is not located in the vicinity of any odor generating use. The emissions from the equipment that will be used on-site during the construction phase will be minor. Idling from construction vehicles and equipment will be restricted to five minutes or less based on standard SCAQMD protocols. Therefore, the odors and attendant impacts generated by diesel powered equipment will be less than significant.

3.3.3 MITIGATION MEASURES

The analysis of air quality impacts indicated that the following Standard Conditions and mitigation will be required.

Standard Conditions

SC AIR-1. The Applicant must comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, by incorporating best available control measures during construction. This Standard Condition shall be printed on construction drawings and included as a requirement in the construction contract.

SC AIR-2. The Applicant must comply with South Coast Air Quality Management District Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, to reduce asbestos containing materials (ACM) or asbestos containing construction materials (ACCM) during demolition or construction.

SC AIR-3. The Applicant must comply with South Coast Air Quality Rule 1113, Architectural Coatings, to reduce Volatile Organic Compound (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.

²⁹ South Coast Air Quality Management District. *CEQA Air Quality Handbook*, As amended 2017.

Mitigation Measure

Mitigation Measure No. 1 (Air Quality). At no time shall the identified asbestos containing materials (ACM) or asbestos containing construction materials (ACCM) be drilled, cut, sanded, scraped, or otherwise disturbed by untrained personnel. These materials shall be removed prior to any activities which will disturb these materials. Asbestos disturbance and/or removal must be conducted by a California Division of Occupational Safety and Health (DOSH) registered and State licensed asbestos removal contractor. Disturbance and/or abatement operations shall be performed under the direct supervision of a California Certified Asbestos Consultant or Certified Site Surveillance Technician.^[A2]

3.4 BIOLOGICAL RESOURCES

3.4.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.*

The proposed project is a request to adaptively reuse an existing commercial building located along the north side of Lime Avenue. The project site is within an urban area and no natural vegetation remains. A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDDB) Bios Viewer for the Azusa Quadrangle (while a portion of the City is located within this Quadrangle, the site is located entirely within the Quadrangle) indicates that there are nine threatened or endangered species located within the Azusa Quadrangle.³⁰ These species include:

- The *California gnatcatcher* is not likely to be found on-site due to the lack of habitat suitable for the California gnatcatcher. The absence of coastal sage scrub, the California gnatcatcher's primary habitat, further diminishes the likelihood of encountering such birds.³¹
- The *least Bell's vireo* lives in a riparian habitat, with a majority of the species living in San Diego County. As a result, it is not likely that any least Bell's vireos will be encountered in the project area due to the lack of riparian habitat in the surrounding area.³²
- The *Santa Ana sucker* will not be found on-site because the Santa Ana sucker is a fish and there are no bodies of water present on-site.³³

³⁰ California Department of Fish and Wildlife. *Bios Viewer*. <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>.

³¹ Audubon. *California Gnatcatcher (Polioptila californica)*. <https://www.audubon.org/field-guide/bird/california-gnatcatcher>.

³² California Partners in Flight Riparian Bird Conservation Plan. *Least Bell's Vireo (Vireo bellii pusillus)*. http://www.prbo.org/calpif/htmldocs/species/riparian/least_bell_vireo.htm.

³³ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was completed on March 1, 2019.

- The *California red-legged frog* will not be found on or near the project site due to its specific habit requirements.³⁴ According to the National Wildlife Federation, California red-legged frogs can be found near still or slow moving ponds, pools, or streams (wetland areas).³⁵ The chances of encountering this species within the project site are limited since there are no natural wetlands or habitats present in the area.
- The *Willow Flycatcher's* habitat consists of marsh, brushy fields, and willow thickets. These birds are often found near streams and rivers and are not likely to be found on-site due to the lack of marsh habitat.³⁶
- The *Braunton's Milkvetch* was not identified on-site. The only vegetation present on-site consists of ornamental species.³⁷
- The *Slenderhorned Spineflower* was not identified on-site. The only vegetation present on-site consists of ornamental species.³⁸
- The *Southern California Steelhead Trout* will not be found on-site since the Southern California Steelhead Trout is a fish and there are no bodies of water present on-site.³⁹
- *Mountain Yellow Legged Frogs* are found isolated in the headwaters of streams or tributaries.⁴⁰ As indicated previously, the project site is located in the midst of an urban area. There are no bodies of water located on-site that will be capable of supporting populations of California Orcutt grass nor does the site have the capacity to form vernal pools during wet seasons.

The proposed project will not have an impact on the aforementioned species since the project site is located within an urban area. The project site and surrounding areas are not conducive to the survival of the aforementioned species due to the level of development and lack of suitable habitat. As a result, no impacts on any candidate, sensitive, or special status species will result from the proposed project's implementation.

³⁴ National Wildlife Foundation. *California Red-Legged Frog*. Website <http://www.nwf.org/wildlife/wildlife-library/amphibians-reptiles-and-fish/california-red-legged-frog.aspx> Website accessed on March 2019.

³⁵ Ibid.

³⁶ Audubon. *Willow flycatcher (Empidonax traillii)*. <http://birds.audubon.org/birds/willow-flycatcher>.

³⁷ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was completed on March 1, 2019

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ U.S. Fish and Wildlife Service. *Recovery Plan for the Southern California Distinct Population Segment of the Mountain Yellow-legged Frog*. https://ecos.fws.gov/docs/recovery_plan/Southern%20CA%20MYLF%20Recovery%20Plan.pdf

B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? • No Impact.

The project site is currently occupied by a commercial building. In addition, the site is paved over and the only landscaping present on-site consists of introduced ornamental species used in landscaping. The field survey conducted for this project site indicated that there are no wetlands or riparian habitat present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.⁴¹ In addition, there are no designated “blue line streams” located within the project site. As a result, no impacts on natural or riparian habitats will result from the proposed project’s implementation.

C. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.

As indicated in the previous subsection, the project site and adjacent developed properties do not contain any natural wetland and/or riparian habitat.⁴² As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and thus, no impacts will occur.

D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? • Less than Significant Impact.

The United States Fish and Wildlife Service is responsible enforcing the Migratory Bird Treaty Act of 1918. The Migratory Bird Treaty Act of 1918 makes it illegal to take, possess import, export, transport, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such bird except under the terms of a valid Federal permit.⁴³ There are four mature trees located on-site, which may have the potential to harbor migratory birds. These four mature trees will remain on-site during the proposed project’s implementation. Therefore, the likelihood of disturbing nesting and migratory birds is remote. In addition, the project site is surrounded by development on all sides and lacks suitable wildlife habitat.⁴⁴ Furthermore, the project site contains no natural hydrological features. Constant disturbance (traffic, light, noise and vibration) from vehicles travelling on the adjacent roadways such as Ivy Avenue limit the project site’s utility as a migration corridor. As a result, less than significant impacts to native or migratory species will occur.

⁴¹ United States Fish and Wildlife Service. *National Wetlands Inventory*. <https://www.fws.gov/Wetlands/data/Mapper.html>

⁴² Ibid.

⁴³ U.S. Fish and Wildlife Service. *Migratory Bird Treaty Act*. <https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php>

⁴⁴ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted March 1, 2019.

- E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • No Impact.*

Oak Trees are designated by the City for preservation under Section 17.20.040 of the City's Municipal Code. According to that section of the Municipal Code, the preservation of healthy oak trees is necessary to preserve the present scenic beauty and heritage of Monrovia, maintain property values, and promote conservation of natural resources. An Applicant is required to obtain an oak tree preservation permit prior to cutting, killing, removing, or pruning an oak tree, or if irrigation is to be installed or grading is to take place.

The proposed project's implementation will not involve the removal of any oak trees, street trees, or the four mature trees located on-site. As a result, no impacts will occur.

- F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? • No Impact.*

The City of Monrovia designated 1,416 acres of City owned land in 2016 for the creation of the Monrovia Hillside Wilderness Preserve.⁴⁵ This preserve is located in the northernmost portion of the City along the base of the San Gabriel Mountains. The proposed project's implementation will not affect the Monrovia Hillside Wilderness Preserve since the proposed project will adaptively reuse an existing commercial building in the downtown business district more than 1.25 miles south of the Preserve. Daily operations such as the loading and unloading of trucks will be limited to the project site and the proposed project's operation will not affect the Monrovia Hillside Wilderness Preserve. Therefore, no impacts will occur.

3.4.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to biological resources will result from the proposed project's implementation. As a result, no mitigation is required.

3.5 CULTURAL RESOURCES

3.5.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? • No Impact.*

⁴⁵ LSA Associates, Inc. *City of Monrovia Hillside Wilderness Preserve and Hillside Recreation Area Draft Resource Management Plan*. Plan dated August 2008.

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. A site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. The State, through the State Historic Preservation Office (SHPO), maintains an inventory of those sites and structures that are historically significant. Finally, the U.S. Department of Interior has established specific Federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places.⁴⁶ To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements.⁴⁷ State historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, that is historically or archaeologically significant. The State regulations that govern historic resources and structures include Public Resources Code (PRC) Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is the principal statute governing the environmental review of projects in the State.

The project site is not included on a list of historic resources compiled by the United States Department of the Interior, National Park Service or a list of historic resources identified by the State Office of Historic Preservation (SHPO).⁴⁸ The proposed project is a request to adaptively reuse an existing commercial building. The building's exterior façade will remain intact, though new paint will be applied to the aluminum louvers, the canopy, eaves, and concrete panels. These improvements comply with the City's goal of preserving historic buildings and districts. According to the City's General Plan Land Use Element:

“Historic preservation is desired in Monrovia to ensure the maintenance and continuation of the many important and notable structures that create the unique sense of place that defines Monrovia. Historic preservation is an integral part of land use planning that can have other benefits as well, such as: affordable housing; revitalization of neighborhoods; diversification of housing opportunities; increase in economic incentives to rehabilitate housing; and conservation of resources. Numerous historic residences from the turn of the century lend charm and character to Monrovia. The community values the small-town historic atmosphere of Myrtle Avenue and feels that it should be maintained. The City adopted a Neighborhood Compatibility Ordinance that seeks to preserve homes built before 1940 if they have historic value and contribute to the historic nature of a particular neighborhood.”

⁴⁶ U.S. Department of the Interior, National Park Service. *National Register of Historic Places*. <http://nrhp.focus.nps.gov>. 2010.

⁴⁷ Ibid

⁴⁸ California Department of Parks and Recreation. *California Historical Resources*. Website <http://ohp.parks.ca.gov/ListedResources>. Website accessed in April 17, 2019.

While the project site does not occupy frontage on Myrtle Avenue, the site is located within the Old Town Monrovia district. The reuse of the existing building is consistent with the vision stated above. In addition, the proposed project is consistent with the following General Plan policy:

- *Policy 9.6:* Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.

Since the proposed project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? • No Impact.

The greater Los Angeles Basin was previously inhabited by the Gabrieleño people, named after the San Gabriel Mission. The Gabrieleño-Kizh tribe has lived in this region for around 7,000 years.⁴⁹ Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin.⁵⁰ Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. Formal Native American consultation was provided in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. The City received one email response from the Gabrieleño-Kizh dated April 17, 2019. This email response is provided in Appendix C. The tribal representative of the Gabrieleño-Kizh indicated that the project site is located in the midst of an urban area and that the project has a low potential to impact Tribal Cultural Resources (TCR). Therefore, additional mitigation for monitoring for TCR's is not necessary for this project and no impacts will result.

C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries? • No Impact.

There are no cemeteries located in the immediate area. The nearest cemetery to the project site is Live Oak Memorial Park, located approximately 1.2 miles to the south of the project site along the south side of Duarte Road.⁵¹ The proposed project will not affect the aforementioned cemetery. In addition, no excavation will occur as part of the proposed construction activities. As a result, no impacts will result.

3.5.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to cultural, historic, and/or tribal

⁴⁹ Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html.

⁵⁰ Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/component/k2/item/453-tongva-village-site>.

⁵¹ Google Earth. Website accessed April 17, 2019.

cultural resources will result from the proposed project’s implementation. As a result, no mitigation is required.

3.6 ENERGY

3.6.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? • Less than Significant Impact.*

In order to be consistent with the Traffic Memorandums, 86,729 square feet dedicated to self-storage uses and 5,520 square feet of commercial space (including the 984 square feet commercial hallway) was analyzed. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative.

Table 3-6 below provides an estimate of electrical and natural gas consumption for the proposed project. As indicated in the table, the proposed project is estimated to consume approximately 483,377 kilowatts (kWh) of electricity and 3,594 therms of natural gas. Table 3-6 also provides an estimate of the previous tenant’s annual electrical and natural gas consumption. As shown in the table, the previous use consumed up to 1,483,363 kilowatts (kWh) of electricity and 16,605 therms of natural gas. The implementation of the proposed project will result in a net decrease in electrical and natural gas consumption. As shown in the table, the proposed project will result in a net decrease in consumption of 999,586 kilowatts of electricity and 13,011 therms of natural gas annually.

**Table 3-6
 Estimated Annual Energy Consumption**

Project	Consumption Rate	Total Project Consumption
Previous Office Use (assumes 92,249 sq. ft.)		
Electrical Consumption	16.08 kWh/sq. ft./year	1,483,363 kWh/year total
Natural Gas Consumption	0.18 therms/sq. ft./year	16,605 therms/year total
Unrefrigerated Warehouse/Self Storage* (assumes 86,729 sq. ft.)		
Electrical Consumption	4.55 kWh/sq. ft./year	394,616 kWh/year total
Natural Gas Consumption	0.03 therms/sq. ft./year	2,601 therms/year total
All Office (assumes 5,520 sq. ft.)		
Electrical Consumption	16.08 kWh/sq. ft./year	88,761 kWh/year total
Natural Gas Consumption	0.18 therms/sq. ft./year	993 therms/year total
Total Electrical Consumption		483,377 kWh/year total
Total Natural Gas Consumption		3,594 therms/year total

Net Change, Electrical Consumption	-999,586 kWh/year total
Net Change, Natural Gas Consumption	-13,011 therms/year total

Source: CEC End-Use Survey.

*Note. The generation rates for unrefrigerated warehouse were used since this land use is similar enough to the self-storage component of the proposed project. Additionally, self-storage facilities are not listed under Section 17.08.010 of the City’s municipal code. The only land use that specifically mentions storage is warehousing/wholesaling, which is similar to self storage uses in that they generate fewer daily trips than commercial uses.

It is important to note that the proposed project will include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2016 California Building and Green Building Code requirements. The proposed project will be in accordance with the City’s Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. As a result, less than significant impacts will occur.

B. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? • Less than Significant Impact.

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning (which is to ensure that the building’s energy efficient fixtures meet or exceed their performance and energy savings) to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version addresses additional items such as clean air vehicles, increased requirements for electric vehicles charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements. The proposed project will be involved in self-storage and commercial uses. A majority of the energy that will be consumed by daily operations will be related to lighting, cooling, and ventilation. Adherence to the requirements identified in the California Green Building Code will further ensure conformance with the State’s goal of promoting energy and lighting efficiency. As a result, the impacts are considered to be less than significant.

3.6.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to energy will result from the proposed project’s implementation. As a result, no mitigation is required.

3.7 GEOLOGY & SOILS

3.7.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project, directly or indirectly, cause 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 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), strong seismic ground-shaking, seismic-related ground failure, liquefaction, or landslides? • Less than Significant Impact.

The City of Monrovia is located in the seismically active region of Southern California. Many major and minor local faults traverse the entire Southern California region, posing a threat to millions of residents, including those who reside in the City of Monrovia. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.⁵² The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.⁵³ A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Monrovia is on the list.⁵⁴

There are four fault traces that traverse the City. It is important to note that while the City contains four fault traces, project site is not within any of the four Alquist-Priolo Zones and will not directly be impacted by fault rupture. These faults include the Raymond Fault, located 0.88 miles to the northwest of the project site; the Duarte Fault, located 0.66 miles to the northeast of the project site; the Sierra Madre Fault, located 1.13 miles; and the Clamshell Canyon Fault, located 3.68 miles to the north of the site (refer to Exhibit 3-2).⁵⁵

The impacts from fault rupture will be no greater for the project site than for the surrounding areas. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The proposed project is a request to adaptively reuse an existing commercial building primarily comprised of brick. The project Applicant may be required to adhere to the recommendations identified in Appendix A – Guidelines for the Seismic Retrofit of Existing Buildings of the 2016 California Existing Building Code since the existing building contains masonry walls. The retrofitting of existing masonry buildings is required by the State of California. This building may have been retrofitted previously, but installing new interior partitions will provide the Applicant an opportunity to include additional seismic reinforcements based on the recommendations made by the State in the Building Code. These recommendations include, but are not limited to, the installation of wall bracing, improvements made to prevent the movement of the building's frame, and the use of wall anchors. The recommendations included in Appendix A of the 2016 California Existing Building Code will minimize the risk fault rupture may pose on future patrons and employees. The impacts in regards to ground shaking will also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or

⁵² California Department of Conservation. *What is the Alquist-Priolo Act.*
<http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>.

⁵³ Ibid.

⁵⁴ California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx>.

⁵⁵ Distances were derived from Shapefiles provided by the California Department of Conservation.

fault. The proposed improvements will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from ground shaking.

Other potential seismic issues include ground failure, liquefaction, and lateral spreading. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is not located within a liquefaction zone (refer to Exhibit 3-2). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid.

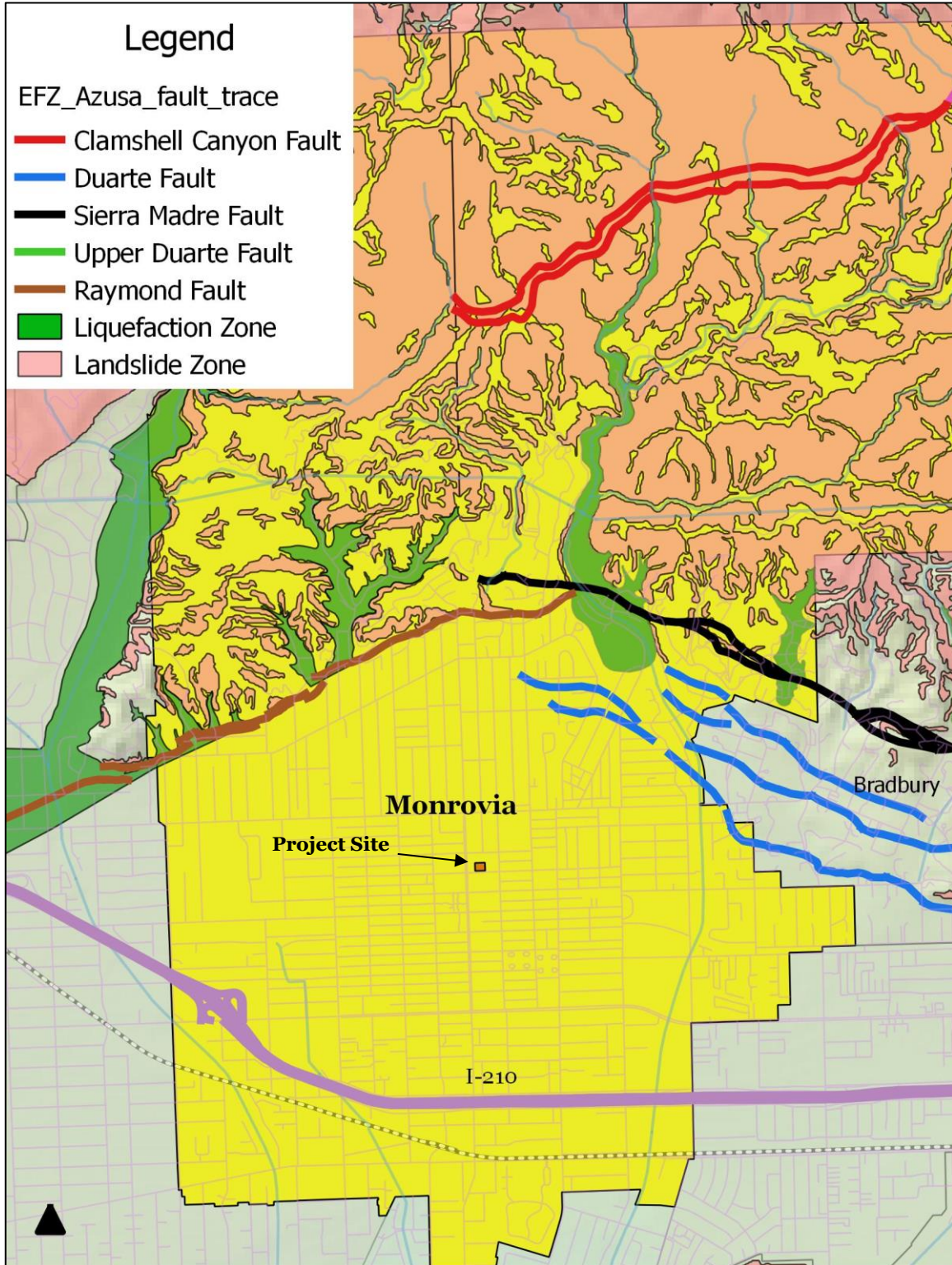


EXHIBIT 3-2
SEISMIC HAZARDS MAP
SOURCE: UNITED STATES GEOLOGICAL SURVEY AND QGIS

Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. Lastly, the project site is not subject to the risk of landslides (refer to Exhibit 3-2). Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed development since the project site is not located within an area that may be subject to liquefaction. Therefore, lateral spreading caused by liquefaction will not affect the proposed project. Lastly, the underlying soils are not prone to shrinking and swelling (refer to Section 3.7.2.D). The impacts will be less than significant.

B. Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.

The proposed project is a request to adaptively reuse an existing commercial building. A majority of the proposed improvements will occur indoors, though exterior work will be done within the parking areas. According to Section 15.28.050 – Permit Required of Chapter 15.28 - Grading and Erosion Control, work done in the parking areas may entail obtaining a grading permit and work performed between October 15 and April 15 may require an erosion control permit. Once operational, the project site will continue to be paved over and landscaped, which will minimize soil erosion. As a result, the impacts will be less than significant.

C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? • Less than Significant Impact.

The proposed project is a request to adaptively reuse an existing commercial building. A majority of the proposed improvements will occur indoors, though exterior work will be done within the parking areas. The UC Davis SoilWeb soil survey was consulted to determine the nature of the soils that underlie the project site. According to the SoilWeb, the site is underlain by Urban Land-Soboba complex soils.⁵⁶ Urban Land-Soboba complex soils are excessively drained and are characterized by very slow runoff and very rapid permeability.⁵⁷ The proposed project will involve limited outdoor construction.

The entire project site is and will continue to remain level and covered over in impervious surfaces. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project because the project site is not located within a liquefaction zone. The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics expand according to the moisture content present at the time. Since the underlying soils are not prone to shrinking and swelling, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the proposed project's implementation will not require

⁵⁶ UC Davis. *SoilWeb*. <https://casoilresource.lawr.ucdavis.edu/gmap/>

⁵⁷ United States Department of Agriculture, Soil Conservation Service. *Soil Survey of Orange County and Western Part of Riverside County, California*. September 1978. And UC Davis. *SoilWeb*. <https://casoilresource.lawr.ucdavis.edu/gmap/>

grading and excavation that will extend to depths required to encounter groundwater. In addition, the proposed project will not result in the direct extraction of groundwater located below ground surface (BGS) since it will continue to be connected to the City's water system.

As stated previously, the soils that underlie the project site are not prone to subsidence. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink. No groundwater will be drained to accommodate the implementation of the proposed project. In addition, the proposed project will not result in the direct extraction of groundwater located below ground surface (BGS). Therefore, the likelihood of on-site subsidence is remote. As a result, the impacts will be less than significant.

D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? • No Impact.

The soils that underlie the project site are not prone to shrinking and swelling. Shrinking and swelling is influenced by the amount of clay present in the underlying soils.⁵⁸ According to the United States Department of Agriculture, the soils that comprise the Urban Land – Soboba complex soils possess a low potential for shrinking and swelling.⁵⁹ As a result, no impacts related to expansive soils will occur.

E. Would the project 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? • No Impact.

No septic tanks will be used as part of proposed project. The proposed use will continue to be connected to the existing sanitary sewer system. As a result, no impacts will occur as part of the proposed project's implementation.

F. Would the project, directly or indirectly, destroy a unique paleontological resource or site or unique geologic feature? • Less than Significant Impact.

The proposed project is a request to adaptively reuse an existing commercial building. A majority of the proposed improvements will occur indoors, though exterior work will be done within the parking areas. Paleontological resources or geologic features are not anticipated to be encountered during the project's construction phase due to the age of the soil and the limited amount of excavation required to implement the proposed project. Given the degree of previous disturbance on-site, the likelihood of encountering paleontological resources is slim. As a result, the impacts will be less than significant.

⁵⁸ Natural Resources Conservation Service Arizona. *Soil Properties Shrink/Swell Potential*. http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2_065083

⁵⁹ United States Department of Agriculture Soil Conservation Service. *Report and General Soil Map Orange, California*. Revised 1969.

3.7.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to geology, soils, and/or paleontological resources will result from the proposed project's implementation. As a result, no mitigation is required.

3.8 GREENHOUSE GAS EMISSIONS

An Air Quality and Noise Study dated June 11, 2019 was prepared by Blodgett Baylosis Environmental Planning. The tables and analysis presented in the aforementioned Study were incorporated into this Section verbatim. This Air Quality and Noise Study, including the ancillary CalEEMod Worksheets, can be found under Appendix A of this IS/MND.

3.8.1 ENVIRONMENTAL ANALYSIS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions, or gases that trap heat in the atmosphere. GHG is emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface will be about 61°F cooler.⁶⁰ However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO₂E (MTCO₂E) per year for commercial projects, 3,500 MTCO₂E per year for residential projects, 3,000 MTCO₂E per year for mixed-use projects, and 7,000 MTCO₂E per year for industrial projects. The SCAQMD currently has an established threshold of 10,000 MTCO₂E per year for industrial development (according to the SCAQMD, this threshold may be used for all type of development if the lead agency does not have a threshold identified).⁶¹ The 1,400 MTCO₂E per year threshold was used in an effort to be conservative.

The remodeled building will include 85,756 square feet of self storage space and 973 square feet of self storage office space, for a total of 86,729 square feet dedicated to self-storage uses. Four ground-level commercial tenant spaces and a commercial hallway (totaling 5,520 square feet) not related to the self storage use will also be provided. In order to be consistent with the Traffic Memorandums, 86,729 square feet dedicated to self-storage uses and 5,520 square feet of commercial space (including the 984 square feet commercial hallway) was analyzed in the CalEEMod.

Table 3-7 summarizes annual greenhouse gas (CO₂E) emissions from the proposed project. Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouses gases in a common and collective unit. As indicated in Table 3-7, the CO₂E total for the proposed project is 629.94

⁶⁰ California, State of. OPR Technical Advisory – CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review. June 19, 2008.

⁶¹ Phone Call with Ms. Lijin Sun of the SCAQMD.

MTCO₂E per year, which is below the aforementioned threshold. The project’s construction will result in an annual generation of 150.68 MTCO₂E per year. When amortized over a 30-year period, these emissions decrease to 5.02 MTCO₂E per year. These amortized construction emissions were added to the project’s operational emissions to calculate the proposed project’s true GHG emissions. As shown in the table, the proposed project’s total operational emissions will be 634.96 MTCO₂E per year, which is still below the thresholds identified for commercial land uses.

**Table 3-7
 Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term – Area Emissions	--	--	--	--
Long-Term - Energy Emissions	137.71	--	--	138.22
Long-Term - Mobile Emissions	329.38	0.01	--	329.77
Long-Term – Waste Emissions	17.59	1.03	--	43.58
Long-Term – Water Emissions	96.08	0.68	0.01	118.36
Long-Term - Total Emissions	580.77	1.75	0.01	629.94
Total Construction Emissions	150.08	0.02	0.01	150.68
Construction Emissions Amortized Over 30 Years				5.02 MTCO₂E
Total Operational Emissions with Amortized Construction Emissions				634.96 MTCO₂E
Significance Threshold				1,400 MTCO₂E

The GHG emissions estimates reflect what a self storage warehouse and commercial of the same location and description would generate once fully operational. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative. The type of activities that may be undertaken once the proposed project is operational have been predicted and accounted for in the model for the selected land use type. It is important to note that the proposed project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the proposed project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).⁶² Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities.

⁶²California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies.

As a result, the impacts will be less than significant.

B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.

Assembly Bill 32 (AB-32), written by Fran Pavely (Assembly Member) and Fabian Nunez (Assembly Speaker) was signed into law September 27, 2006 which requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.⁶³ The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The emissions generated by the proposed project will be less than the thresholds of significance established for CO₂ (refer to Table 3-5). As indicated in Section 3.6 – Energy, the proposed project will be in compliance with the City's Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. Since the proposed project will be in conformance with Part 6 and Part 11 regulations, the impacts will be less than significant.

3.8.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding GHG emissions and conformance to GHG reduction polices will result from the proposed project's implementation. As a result, no mitigation is required.

3.9 HAZARDS & HAZARDOUS MATERIALS

An Asbestos and Lead Based Paint Survey was conducted for the proposed project by Ardent. The results of the survey were summarized in a report dated December 20, 2018, which is provided in Appendix B. The results of the asbestos survey indicate that ACM and Asbestos Containing Construction Materials (ACCM) are present in the building and mitigation is required.

3.9.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.

The project's construction will require the limited use of diesel fuel to power the construction equipment. The diesel fuel will be properly sealed in tanks and will be transported to the site by truck. Other hazardous materials that will be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. As indicated previously, the project is a proposal to remodel the existing building located on-site. Due to the age of the existing building, lead based paint (LBP) or asbestos containing materials (ACMs) may be present and could be released during the construction period. As a result, lead based paint and/or asbestos containing

⁶³ Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* <http://gov.ca.gov/news.php?id=18938>.

materials will be removed by a certified abatement contractor. The removal of lead based paint and/or asbestos containing materials will be done in accordance with SCAQMD Rule 1403-Asbestos Emissions from Demolition/Renovation Activities.

The project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).⁶⁴ In addition, the project site is not identified on any Leaking Underground Storage Tank database (LUST).⁶⁵ A search through the California Department of Toxic Substances Control's Envirostor database indicated that the project site was not included on any Federal or State clean up or Superfund lists.⁶⁶ The EPA's multi-system search was consulted to determine whether the project site is identified on any Federal Brownfield list; Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List; Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities List; and/or Federal RCRA Generators List. The site is not on the list.⁶⁷ Therefore, the proposed project's implementation will not create significant hazards involving the transport and removal of residual contamination. Once operational, the project will not create a significant hazard to the public or the environment since no hazardous materials will be stored on-site. The rental agreement will contain specific restrictions prohibiting tenants from storing hazardous materials on-site. As a result, the impacts will be less than significant.

B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact with Mitigation.

The project's construction will require the use of diesel fuel, solvents, architectural coatings, and equipment lubricants. In addition, lead based paint (LBP) and asbestos containing materials (ACMs) are present and could be released during the remodel. Nevertheless, lead based paint and/or asbestos containing materials will be removed by a certified abatement contractor pursuant to Mitigation Measure Number 1 identified in Section 3.3. The removal of lead based paint and/or asbestos containing materials will also be done in accordance with SCAQMD Rule 1403-Asbestos Emissions from Demolition/Renovation Activities. In addition, Standard Conditions 1 through 3 identified in Section 3.3 are also required. As stated in the previous subsection, the project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List) or the California Department of Toxic Substances Control's Envirostor database. Additionally, the site is not listed on the Leaking Underground Storage Tank database (LUST), or the U.S.

⁶⁴ CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

⁶⁵ California State Water Resources Control Board. *GeoTracker*. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=monrovia.ca>

⁶⁶ CalEPA. *Envirostor*. http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global_id=&x=-119&y=37&z1=18&ms=640.480&mt=m&findaddress=True&city=Monrovia

⁶⁷ United States Environmental Protection Agency. *Multisystem Search*. Website accessed May 14, 2018.

EPA's multi-system search.^{68,69,70,71}

Therefore, the proposed project's implementation will not create significant hazards involving the transport and removal of residual contamination. As indicated previously, the project's operation will not require the use of hazardous materials beyond what is typically used in a household setting for routine cleaning and maintenance will be used once the proposed project is occupied. As a result, the impacts will be less than significant.

C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • No Impact.

Clifton Middle School is located 400 feet to the northeast of the project site.⁷² The project's construction will require the use of diesel fuel to power the construction equipment. The diesel fuel will be properly sealed in tanks and will be transported to the site by truck. Other hazardous materials that will be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. The transport of these materials is regulated by the Department of Transportation under the Hazardous Materials Transportation Act, which the project's contractors must comply with. Because of the nature of the proposed use, no hazardous or acutely hazardous materials will be emitted. The rental agreement will prohibit future tenants from storing hazardous materials on-site. As a result, no impacts are anticipated.

D. Would the project 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? • No Impact.

The "Cortese List," also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC's Brownfields and Environmental Restoration Program referred to as EnviroStor. A search of the Envirostor Hazardous Waste and Substances Site List website was completed to identify whether the project site is listed in the database as a Cortese site. The site is not identified on the list.⁷³ Therefore, no impacts will result with the implementation of the proposed project.

⁶⁸ CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

⁶⁹ California State Water Resources Control Board. *GeoTracker*. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=monrovia,ca>

⁷⁰ CalEPA. *Envirostor*. http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global_id=&x=-119&y=37&zl=18&ms=640.480&mt=m&findaddress=True&city=monrovia

⁷¹ United States Environmental Protection Agency. *Multisystem Search*. Website accessed March 20, 2019.

⁷² Google Earth. Site accessed April 18, 2019.

⁷³ CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm. March 21, 2019.

E. Would the project 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? • No Impact.

The project site is not located within two miles of a public airport. The closest airport to the project site is the San Gabriel Valley Airport, located 4.36 miles to the south in the City of El Monte.⁷⁴ The project site is not located within the Runway Protection Zone (RPZ) for the San Gabriel Valley Airport and the proposed project will not penetrate the airport's 20:1 slope.⁷⁵ The proposed project will not introduce any new building or structure that will interfere with the approach and take off of aircraft utilizing the aforementioned airport. As a result, no impacts will result.

F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? • No Impact.

At no time will Lime Avenue or Ivy Avenue or any other nearby streets be completely closed to traffic. Scaffolding may necessitate the closure of the pedestrian walkway in front of the existing building along the north side of Lime Avenue. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire? • No Impact.

The adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project site. There is no chaparral present on-site or within the adjacent properties that will result in a heightened wild land fire risk. The project site is located outside of any wildfire risk designation area.⁷⁶ As a result, no risk from wildfire will occur with the approval and subsequent occupation of the proposed project.

3.9.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding hazards and hazardous materials will result from the proposed project's implementation with the implementation of Mitigation Measure No. 1 and Standard Conditions 1 through 3 identified in Section 3.3. As a result, no additional mitigation is required.

⁷⁴ Google Earth. Website accessed March 20, 2019.

⁷⁵ Los Angeles County Department of Regional Planning. *Los Angeles County Airport Landuse Commission (ALUC), Airport Layout Plan*. http://planning.lacounty.gov/assets/upl/project/aluc_elmonte-plan.pdf

⁷⁶ Cal Fire. *Fire Hazard Severity Zone in SRA for Los Angeles County*. http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf

3.10 HYDROLOGY & WATER QUALITY

Civil engineering plans were prepared by Thienes Engineering. These plans depict the drainage patterns.

3.10.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? • Less than Significant Impact.*

The proposed project is a request to adaptively reuse an existing commercial building. A majority of the proposed improvements will occur inside the existing building though some exterior work will be done. The entire affected site is level and is covered over in impervious surfaces (buildings and pavement).

Stormwater runoff is regulated under Chapter 12.36 - Stormwater and Urban Runoff Pollution Control of the City's Municipal Code. The project Applicant will be required to implement Low Impact Development (LID) measures, also known as Best Management Practices (BMPs) into the project's design. These operational Best Management Practices (BMPs) will reduce the volume of water discharged into the local storm drains and will filter out any contaminants present in the stormwater runoff. These BMPS may include the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. Adherence to the aforementioned City mandated requirements will ensure that all impacts remain at a level that is less than significant. As a result, the impacts will be less than significant.

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.*

The proposed project is a request to adaptively reuse an existing commercial building. A majority of the proposed improvements will take place inside the existing building though exterior work will be done within the parking areas. Therefore no direct construction related impacts to groundwater supplies, or groundwater recharge activities will occur. The proposed use will continue to be connected to the City's water lines and will not result in a direct decrease in underlying groundwater supplies. Furthermore, the construction and post-construction BMPs will filter out contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, the impacts will be less than significant.

- C. *Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would: result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows? • Less than Significant Impact.*

The proposed project's implementation will not facilitate an expansion or reduction in pervious surfaces. Once implemented, the proposed project will change the site's drainage characteristics. Currently, stormwater runoff is discharged off-site into the adjacent streets and alleys or percolates into the ground. The entire site is covered over with impervious surfaces (the existing building and paved parking area). Post project, storm water runoff will continue to be conveyed and discharged off-site into the local stormwater infrastructure. Furthermore, the alley that extends along the site's northern property line is paved and any runoff discharged off-site will not result in erosion or siltation. Lime Avenue, which extends along the south side of the project site, is also paved and features curbs and gutters. Additionally, the proposed project's construction will be restricted to the existing project site boundary and the proposed project will not alter the course of any stream or river that will lead to on-site or off-site siltation or erosion.

As indicated previously, the project Applicant will be required to adhere to the regulations identified in Chapter 12.36 of the Municipal Code. The project Applicant will be required to implement Low Impact Development (LID) measures, also known as Best Management Practices (BMPs) into the project's design. These post-construction BMPs will filter out contaminants of concern, allow runoff to percolate into the ground, and will also result in the controlled discharge of excess runoff off-site. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site. Thus, the proposed project's implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which will exceed the capacity of existing or planned storm water drainage systems; or provide additional sources of polluted runoff. As a result, the impacts will be less than significant.

- D. *Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? • Less than Significant Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the project site is located in Zone X.⁷⁷ This flood zone has an annual probability of flooding of less than 0.2% and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.⁷⁸

⁷⁷ Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>

⁷⁸ FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>

The project site is not located in an area that will be subject to seiche or tsunami. A seiche in the San Gabriel River or the Eaton Canyon Wash is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is located inland approximately 28 miles from the Pacific Ocean and the project area will not be exposed to the effects of a tsunami.⁷⁹

There are two areas, the Sawpit Debris Basin and the Santa Anita Dam, which have the potential for failure caused by seismic activity. The first of these, the Sawpit Debris Basin, located in the foothills in northern portion of the City of Monrovia, has a capacity of 476 acre-feet. If the debris basin failed at capacity, it will require a drainage area of three square miles. The ensuing flood will last approximately 25 minutes and be confined largely within the area bounded by Santa Anita Wash and the Santa Fe Flood Control Basin. A flood of this type will inundate portions of the cities of Monrovia, Duarte, and Bradbury.⁸⁰

The second, the Santa Anita Dam, which was built in 1927, is located to the northwest of downtown Monrovia. This dam has a capacity of 1,376 acre-feet. Should the Santa Anita Dam fail at capacity, the drainage area required will be 11 square miles. Most of the flooding will occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of the Foothill Freeway.⁸¹ As indicated in Figure 3 and Figure 4 of the City's General Plan Conservation Element, the project site is not located within the dam inundation areas for the Sawpit Debris Basin or the Santa Anita Wash. As a result, the impacts with regards to flooding, tsunamis, seiches, or dam inundation will be less than significant.

E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? • Less than Significant Impact.

The proposed project must comply with Chapter 15.28 - Grading and Erosion Control of the City's Municipal Code, which limits the discharge of sediment during construction activities. In addition, the proposed project will be in compliance with Chapter 12.36 - Stormwater and Urban Runoff Pollution Control of the City's Municipal Code. The project Applicant will be required to implement Low Impact Development (LID) measures, also known as Best Management Practices (BMPs) into the project's design. These operational Best Management Practices (BMPs) will reduce the volume of water discharged into the local storm drains and will filter out any contaminants present in the stormwater runoff. These BMPS may include the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. As a result, the impacts will be less than significant.

3.10.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding existing and future on-site hydrological conditions, stormwater runoff, and/or water quality will result from the proposed project's implementation. As a result, no mitigation is required.

⁷⁹ Google Earth. Website accessed March 20, 2019.

⁸⁰ City of Monrovia General Plan. *Safety Element*. Element dated 2002.

⁸¹ Ibid.

3.11 LAND USE & PLANNING

3.11.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community?* • *No Impact.*

The existing three-and four-story building is located within the City of Monrovia on the north side of Lime Avenue in the central business district of downtown “Old Town” Monrovia. The project site and the adjacent properties are fully urban. The project site is currently zoned Public/Quasi-Public (P/QP). The properties located north of the site are zoned for Public/Quasi-Public (P/QP) and High Density Residential uses, while the properties located to the south are zoned Public/Quasi-Public (P/QP) and Planned Development. The uses located west of the site are zoned Neighborhood Commercial (NC). Finally, the properties located to the east are zoned Public/Quasi-Public (P/QP). A zoning map is provided in Exhibit 3-3, while a General Plan land use map is provided in Exhibit 3-4. The surrounding land uses and development are described in detail below:⁸²

- *North of the site.* A variety of land uses and development, including a private school, a church, surface parking, and retail uses, are located north of the project site. These uses are separated from the project site by an alley that extends along the north side of the site in an east to west orientation. The existing private school, the Boys Republic School for Boys, is located at 128 East Palm Avenue, #102. The United Methodist Church of Monrovia is located next door to the private school at 128 East Palm Avenue, #104. Finally, a parking lot located to the rear serves a number of commercial businesses with frontage on South Myrtle Avenue.
- *South of the site.* Lime Avenue extends along the south side of the project site in an east to west orientation. Studio Movie Grill (SMG) is located on the south side of Lime Avenue, opposite the project site. In addition, the Monrovia Police Department and City Hall are located southeast of the project site on the southwest corner of Ivy Avenue and Lime Avenue.⁸³
- *East of the site.* A public parking lot abuts the site to the east. This lot is located at the northwest corner of the Ivy Avenue and Lime Avenue intersection.⁸⁴ The First Indonesian Baptist Church and the accompanying parking lot is located further east on the east side of Ivy Avenue. An older historic residential neighborhood is generally located east of Ivy Avenue.

⁸² Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

⁸³ Google Earth. Website Accessed March 1, 2019.

⁸⁴ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

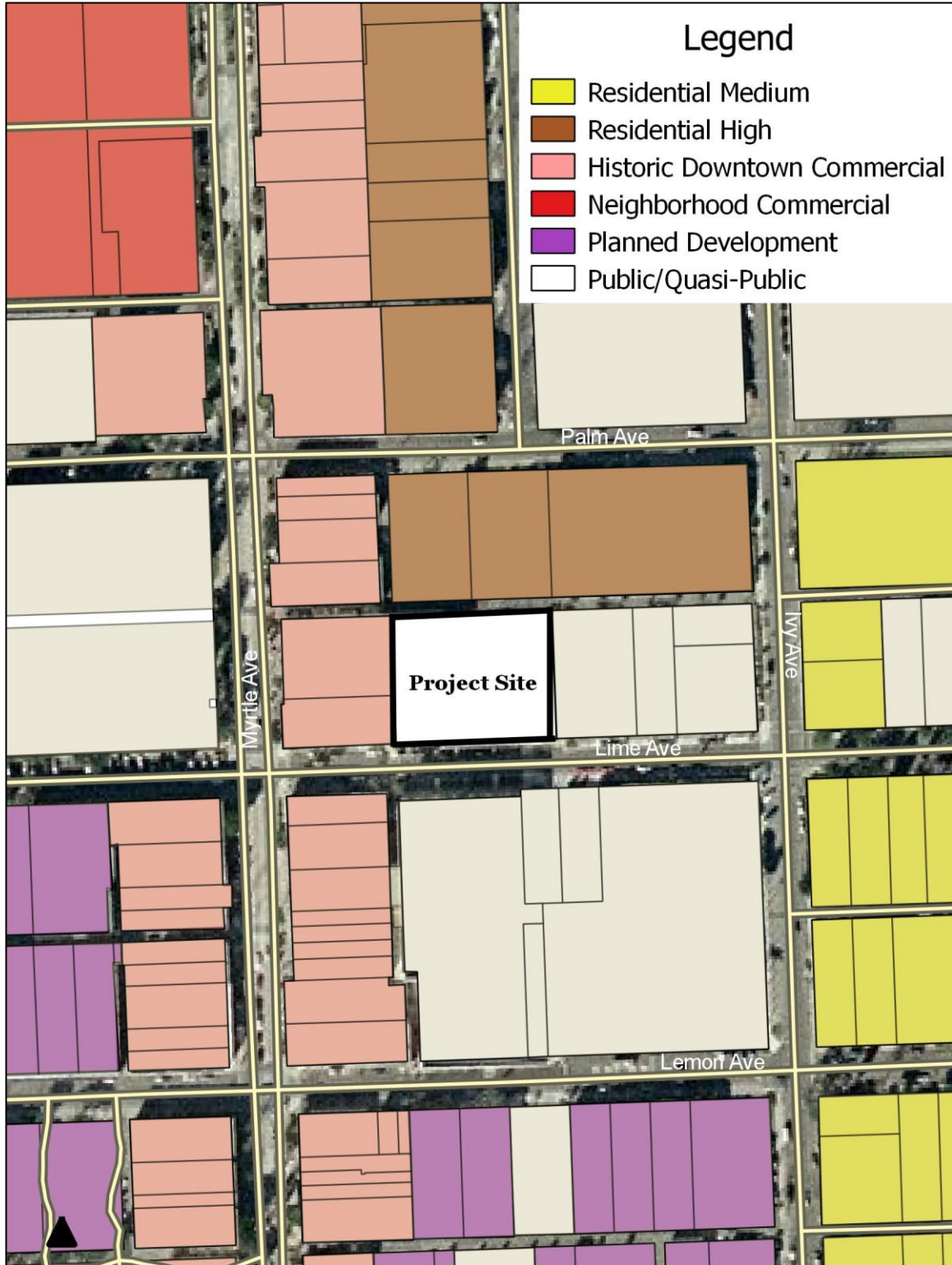


EXHIBIT 3-3 ZONING MAP

SOURCE: CITY OF MONROVIA AND QUANTUM GIS

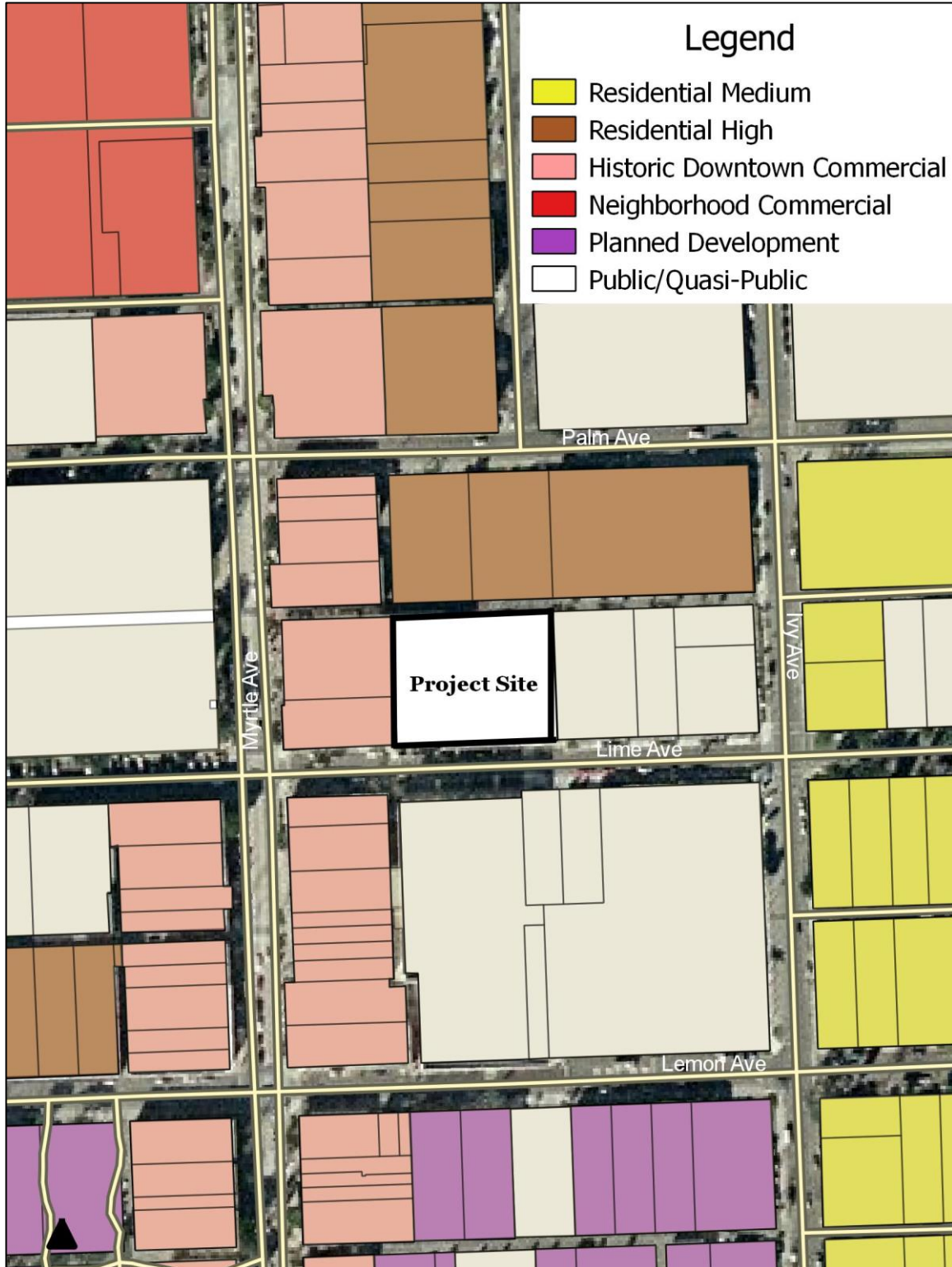


EXHIBIT 3-4
GENERAL PLAN LAND USE MAP
SOURCE: CITY OF MONROVIA AND QUANTUM GIS

- *West of the site.* Various commercial uses abut the project site to the west.⁸⁵ These uses occupy frontage along the east side of Myrtle Avenue. These commercial establishments include, from north to south, D-Drive (324 South Myrtle Avenue), Old Town Pizza (338 South Myrtle Avenue), and Seasoning Alley (342 South Myrtle Avenue).⁸⁶

The proposed self storage use will occupy an existing building that has a total floor area of 92,249 square feet. This building has had various occupants over the years including General Telephone & Electronic Corporation, Pacific Bell, Verizon, and most recently Frontier Communications. The granting of the requested entitlements and subsequent implementation of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the proposed project will not lead to any division of the adjacent neighborhood and no impacts will occur.

B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • Less than Significant Impact.

The proposed project's implementation will require the approval of a General Plan Amendment (including new land use development standards which are referenced below and on the following pages) to change the site's land use designation to Planned Development [Planned Development Area PD-5B (PD-5B)]; a Zone Change to change the site's zoning map designation to Planned Development (PD-5B); a Tentative Parcel Map to consolidate the three parcels into one; and a Conditional Use Permit to permit the operation of a self storage facility.

Planned Development Area – 5 (PD-5) was originally created to address the specific circumstances of Downtown adjacent properties and is a mixture of commercial retail, retail support, private parking, office, restaurants, and some high density residential uses. The Historic Commercial Downtown (HCD) zone is applied to Myrtle Avenue and was intended to ensure that the street retains its commercial focus and identifies as the historic core of Monrovia. PD-5 is applied to most of the side streets of Old Town. PD-5 was amended in 2005 to include a mixed use development and accompanying parking structure located on Colorado Boulevard adjacent to the Myrtle Avenue corridor. The proposed project includes a General Plan Amendment (text and map) and Zoning Amendment (map) to introduce PD-5B: Downtown/115-127 East Lime Avenue. A description of the overall PD-5: Downtown and PD-5B: Downtown/115-127 East Lime Avenue is provided on the following pages.⁸⁷

Area PD-5: Downtown

These areas are adjacent to the Historic Commercial Downtown designations along Myrtle Avenue and generally encompass the side streets running through Old Town Monrovia to Primrose Avenue on the west and Ivy Avenue on the east. This area has historically have been the commercial core of the City; however, there are a substantial number of residential units. These areas can support a variety of uses,

⁸⁵ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on March 1, 2019.

⁸⁶ Google Earth. Website Accessed March 1, 2019.

⁸⁷ A description of the newly amended and expanded PD-5 zone was prepared by Mr. Austin Arnold, Assistant Planner. The descriptions of the new PD-5 zones were compiled into a single document that was emailed on July 18, 2019.

but the uses should be related to Myrtle Avenue and be of a quality that is in keeping with Old Town Monrovia.

The following development guidelines shall apply to PD-Area 5:

1. A pedestrian oriented atmosphere shall be maintained with Myrtle Avenue as the focal point.
2. Encourage businesses such as theaters, restaurants, and specialty retail that support the Myrtle Avenue downtown commercial corridor and other similar uses as determined by the Development Review Committee. Standalone bars, cocktail lounges, liquor stores shall not be allowed.
3. Residential Development shall only be allowed in mixed-use developments on sites exceeding 2 acres in size and shall require the approval of a specific plan.
4. No building setbacks are required except for the following:
 - a. Where a building is adjacent to a residential zone, the multiple story setback standards for the residential zone shall apply.
 - b. For property lines adjacent to Ivy Avenue, a ten-foot setback shall be required.
 - c. The Development Review Committee shall determine appropriate setback requirements based on adjacent land uses.
5. Public improvements shall be compatible with the downtown theme in terms of street furniture, lighting, and landscaping.
6. Public parking lots are permitted.

Area PD-5b: Downtown/115-127 East Lime Avenue

This is a 0.73 acre site located on the north side of Lime Avenue, directly adjacent to the east to the Historic Commercial Downtown designation along Myrtle Avenue. It is developed with a Mid-Century Modern brick building containing four above ground levels and a basement which totals approximately 92,500 square feet in size. A small on-site private parking lot is located to the north of the building, which is accessed by an alley adjacent to the north property line.

The building was constructed in 1954 and has historically been used as a telecommunications facility. Its various occupants over the years include General Telephone & Electronics Corporation, Pacific Bell, Verizon, and most recently Frontier Communications. The building's Mid-Century Modern architectural style consists of brick, concrete, and aluminum louvers; its large size provides an opportunity for creative adaptive re-use.

These development guidelines promote the adaptive reuse of this Mid-Century Modern building that has been a prominent structure in the City's Old Town for over 50 years. The standards encourage a pedestrian-oriented commercial corridor linkage between this site and Myrtle Avenue, and include special review criteria to ensure minimal parking and traffic impacts, given the limited provision of parking on the site.

The following development guidelines shall apply to PD-5b:

1. Minor Commercial Area: Not more than 25 percent of the ground floor fronting Lime Avenue shall be designated as the minor commercial area.
 - a. Commercial uses shall be allowed on the ground floor with storefronts located on Lime Avenue.
 - b. Permitted commercial uses shall be limited to uses that support the downtown commercial businesses and encourage pedestrian activity, such as retail, restaurant, service commercial, and office uses.
 - c. Retail storefront appearance required. All minor commercial area uses must have a front window corridor consistent with the retail nature of Myrtle Avenue.
 - I. Building partitions shall not be constructed within the front 25 feet as measured from the exterior wall of the lease space closest to the front lot line on Lime Avenue.
 - II. Storefront windows facing Lime Avenue shall not be tinted or obscured. Window covering on the storefronts shall be reviewed by the Development Review Committee or the Planning Commission and shall maximize the appearance of an open storefront.
 - III. Bars or other physical security devices shall be discouraged; however, if they are installed, the installation shall be subject to the requirements of the Zoning Ordinance.
2. Major Commercial Area: All other portions of the building, not including the minor commercial area, shall be designated as the major commercial area.
 - a. A self-storage facility may occupy the major commercial area upon the review and approval of a Conditional Use Permit by the Planning Commission.
 - b. Alternatively, other uses proposed within the major commercial area shall be subject to review and approval of a Conditional Use Permit by the Planning Commission. This includes the subdivision of interior space to accommodate additional uses. The review criteria shall include, but are not limited to:
 - i. Parking/Traffic generation; and

- ii. Compatibility with the Historic Commercial Downtown land use provisions;
- 3. The expansion of the building floor area shall not be permitted. However, the Development Review Committee may approve minor modifications to the interior layout of the floor plan for reconfiguration of the major and minor tenant spaces or any other modification as determined by the Development Review Committee deemed to be minor in that it would not materially change the approved project.
- 4. The on-site parking lot shall not be reduced in size.
- 5. Signage for commercial spaces shall be subject to the Zoning Ordinance and shall be included in a detailed master sign program, which shall be submitted to the Development Review Committee for review and approval. The sign program will also be subject to the following limitations:
 - a. Signs shall only be permitted on the South Elevation.
 - b. Signs shall be either halo or non-lit individual channel letters. Signs may be indirectly lit as long as a uniform design is applied to all tenant spaces. Signs shall be centered over the tenant space.
- 6. Public improvements and exterior common areas shall be compatible with the downtown theme in terms of street furniture, lighting, and landscaping.

The proposed project’s conformity with the PD-5b standards is shown below in Table 3-8.

**Table 3-8
 The Project Conformity with PD-5b Zoning Standards**

Description	City Requirements	Project Element	Conforms?
Minor Commercial Area	Not to exceed 25%	22 % (excluding hallway)	Yes
Minimum Distance from lot line for Interior Partitioning	25 ft.	25 ft.	Yes
Increase in Building Floor Area	None	None	Yes

Source: New PD-5b zone description provided by Mr. Austin Arnold, Assistant Planner.

As indicated previously, the existing building is of Mid-Century Modern architecture. The building’s exterior façade consists of brick, concrete, and aluminum louvers. The building’s exterior façade will remain intact, though new paint will be applied to the aluminum louvers, the canopy, eaves, and concrete panels. In addition, the brick shall not be painted. These improvements comply with the City’s goal of preserving historic buildings and districts.

Additionally, the building is currently underutilized, given its location with the City’s downtown business district. The adaptive reuse of existing commercial space and introduction of new uses within the

downtown core encourage a healthy balance of preservation and economic growth. According to the City's General Plan Land Use Element, the revitalization and recycling of existing commercial/industrial areas, economic expansion, and preservation of character of residential neighborhoods and historic areas are encouraged.

While the project site does not occupy frontage on Myrtle Avenue, the site is located within Old Town Monrovia. The reuse of the existing building is consistent with the vision stated above. In addition, the proposed project is consistent with the following General Plan goals and policies:

- *Goal 1:* Provide for a mix of land uses (residential, commercial, and industrial) which provides a balanced community.
- *Policy 1.7:* Provide for location of commercial uses offering goods or services necessary to support office, industrial, research, and development use.
- *Policy 1.9:* Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities to support the City's business community and to satisfy the demands of the City's resident population.
- *Goal 4:* Promote land use patterns and development which contribute to community and neighborhood identity.
- *Policy 4.1:* Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.
- *Policy 4.2:* Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed project.
- *Policy 7.8:* Review and update as needed development guidelines for all the Planned Development areas to guide their future growth.
- *Goal 8:* Promote expansion of the City's economic base.
- *Policy 8.5:* Provide a mix of housing, commercial, and industrial uses to encourage jobs/housing balance.
- *Policy 9.6:* Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.
- *Goal 13:* Promote high quality design in all new commercial and industrial development.
- *Policy 13.1:* Continue design review for all commercial and industrial areas. These guidelines should address architecture, access, setbacks, building articulation, materials, landscaping,

pedestrian amenities, and linkages with nearby activity centers.

- *Policy 13.3:* In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.
- *Policy 13.4:* Encourage increased landscaped setbacks by using a portion of City parkway as determined by the Public Works Department.
- *Policy 13.5:* Encourage "pedestrian friendly" designs for office and retail commercial uses.
- *Policy 13.6:* Encourage strict sign control for new development.

As indicated in the preceding analysis, the proposed project will not deviate from the goals and policies outlined in the City's General Plan. The proposed project is a request to adaptively re-use an existing office building located adjacent to the City's "Old Town" and within 500 feet of residential uses. The proposed project will undergo Design Review and will not involve the construction of additional floor area. Therefore, less than significant impacts will occur upon implementation of the proposed project.

3.11.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding land use and planning will result from the proposed project's implementation. As a result, no mitigation is required.

3.12 MINERAL RESOURCES

3.12.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? • No Impact.*

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.⁸⁸ In addition, according to SMARA, study area maps prepared by the California Geological Survey, the City of Monrovia is located within the larger San Gabriel Valley SMARA (identified as the Portland cement concrete-grade aggregate).⁸⁹ However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the project site is not located in an area where there are significant aggregate resources present.⁹⁰ In addition, the project site is not located in an area with active mineral extraction activities. As a result, no impacts to mineral resources will occur.

⁸⁸ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.99980/34.14895/17>

⁸⁹ California Department of Conservation. *San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations*. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf

⁹⁰ Ibid.

- B. *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?* • *No Impact.*

As stated above, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

3.12.2 MITIGATION MEASURES

The preceding analysis determined that no impacts to mineral resources will result from the proposed project's implementation. As a result, no mitigation is required.

3.13 NOISE

An Air Quality and Noise Study dated June 11th, 2019 was prepared by Blodgett Baylosis Environmental Planning. The tables and analysis presented in the aforementioned Study were incorporated into this Section verbatim. This Air Quality and Noise Study, including the ancillary CalEEMod Worksheets, can be found under Appendix A of this IS/MND.

3.13.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in a generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* • *Less than Significant Impact with Mitigation.*

Before discussing the results of the noise measurement findings, an overview of the characteristics of noise is appropriate. Noise is most often defined as unwanted sound. The decibel (dB) scale is most often used to quantify sound intensity or "loudness." Since the human ear is not equally sensitive to all frequencies within the noise spectrum, noise measurements are typically weighted more heavily within the frequencies of maximum human sensitivity using an *A-weighting* which is expressed as *dBA*. The human ear can typically detect changes in sound levels ranging from 3.0 dBA to 5.0 dBA under normal conditions. Changes in noise levels that are less than 3.0 dBA to 5.0 dBA are typically discernible by only a few persons under extremely quiet conditions.⁹¹ Typical noise levels associated with various activities are illustrated in Exhibit 3-5.

Noise may be generated from a point source, such as machinery or from a line source such as a road containing automobile traffic. Because the area of the sound wave increases as the sound gets further and further from the source, less energy strikes any given point over the surface area of the wave. This phenomenon is known as *spreading loss*. Due to spreading loss, noise attenuates with distance.

⁹¹ U. S. Department of Transportation. Highway Traffic Noise: Analysis and Abatement Guidelines. June 2010. (Revised January 2011)

Typical noise levels in dBA 50 ft. from source

			70	80	90	100
<i>Equipment Powered by Internal Combustion Engines</i>	<i>Earth Moving Equipment</i>	Compactors (Rollers)				
		Front Loaders				
		Backhoes				
		Tractors				
		Scrapers, Graders				
		Pavers				
		Trucks				
	<i>Materials Handling Equipment</i>	Concrete Mixers				
		Concrete Pumps				
		Cranes (Movable)				
		Cranes (Derrick)				
	<i>Stationary Equipment</i>	Pumps				
		Generators				
Compressors						
<i>Impact Equipment</i>	Pneumatic Wrenches					
	Jack Hammers					
	Pile Drivers					
<i>Other Equipment</i>	Vibrators					
	Saws					

EXHIBIT 3-5
TYPICAL NOISE LEVELS FROM CONSTRUCTION EQUIPMENT
 SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

Objects that block the line-of-sight attenuate the noise emanating from a source if the receptor is located within the shadow of the blockage (such as behind a sound wall). If a receptor is located behind the wall, but has a view of the source, the wall will do little to attenuate the noise.

Time variation in noise exposure is typically expressed in terms of the average energy over time (called Leq), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L₅₀ noise level represents the noise level that is exceeded 50% of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. Other values that are typically noted during a noise survey include the L_{min} and L_{max} that represent the minimum and maximum noise levels obtained over a given period.

As stated in the City’s Noise Element short-term, temporary and intermittent noise impacts associated with construction activities may be considered minimal during daytime hours. However, late evening and weekend disturbances related to construction activities experienced at nearby sensitive receptor locations may cause significant impacts. Chapter 9.44 – Noise of the City of Monrovia Municipal Code regulates noise generation in the City. Table 3-9 depicts the permitted increases in noise levels as identified in Section 9.44.060 of the Municipal Code.

Table 3-9
Section 9.44.060 - Permitted Increases in Noise Levels

Permitted Increase in dBA	Duration of Increase Permitted (in minutes per hour)
5	15
10	5
15	1
20	Less than 1 minute

The City Code also includes the following provision in Section 9.44.080.F - Exemptions, which is restated below:

The following activities shall be exempt from the provisions of this chapter:

(F) Construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays.

Section 9.44.080.F of the City’s Municipal Code exempts construction exceeding standards during the specified hours mentioned in Section 9.44.040 of the City’s Municipal Code.

Construction Noise

The proposed project’s construction noise levels were estimated using the Federal Highway Administration’s (FHWA) Roadway Construction Noise Model Version 1.1. The pieces and number of equipment that will be utilized was taken from the CalEEMod worksheets prepared for this project. The distance used between the construction activity and the nearest sensitive receptors varied depending on the individual equipment. As indicated by the model, the proposed project’s construction will average 81.4 dBA at the United Methodist Church. Furthermore, no impact generating devices, such as

jackhammers, will be used during the project's construction, which will further reduce the amount of vibration the United Methodist Church will be exposed to.

It is important to note that a majority of the construction will occur indoors. Thus, the building's shell will attenuate much of the noise generated within the building's interior. The model reflects a worst case scenario in terms of equipment used and the proposed project's average construction noise levels may be lower than the estimate generated by the model. Nevertheless, the proposed project's construction noise is estimated to average 81.4 dBA at the United Methodist Church. Therefore, the Applicant will be required to implement Mitigation Measure No. 2 Noise and Mitigation Measure No. 3.

The first mitigation measure calls for the use of sound suppressing equipment. The use of sound suppressing equipment such as aforementioned shields and mufflers usually results in an average reduction of 9.0 dBA. For example, a typical excavator will produce noise levels of around 80.5 dBA at a distance of 50 feet. In the quietest configuration, with improved exhaust and intake muffling, fan disengaged, and three sound panels around the engine, the overall level was reduced to 71.5 dBA at a distance of 50 feet.⁹² Furthermore, regular maintenance of construction equipment will ensure noise levels do not increase over time. Adherence to the aforementioned mitigation will reduce potential construction impacts to levels that are less than significant.

Operational Noise

An *Extech Model 407730* Digital Sound Meter was used to conduct the noise measurements. A series of 100 discrete intervals were recorded at two separate locations (referred to herein as Location 1 and Location 2). Location 1 was situated along the north side of Lime Avenue at the pedestrian crosswalk. Location 2 was positioned at the northwest corner of the intersection of Lime Avenue and Ivy Avenue. The two measurement locations are illustrated in Exhibit 3-6. The measurements were captured five feet above the ground surface and were captured free from any obstructions. The measurements were taken on a Friday morning at 9:00 AM. Table 3-10 indicates the variation in noise levels over time during the measurement period. As indicated previously, the L₅₀ noise level represents the noise level that is exceeded 50% of the time.

⁹² Laborers' Health and Safety Fund of North America. *Controlling Noise on Construction Sites*.
<https://www.lhsfna.org/LHSFNA/assets/File/bpguide%202014.pdf>

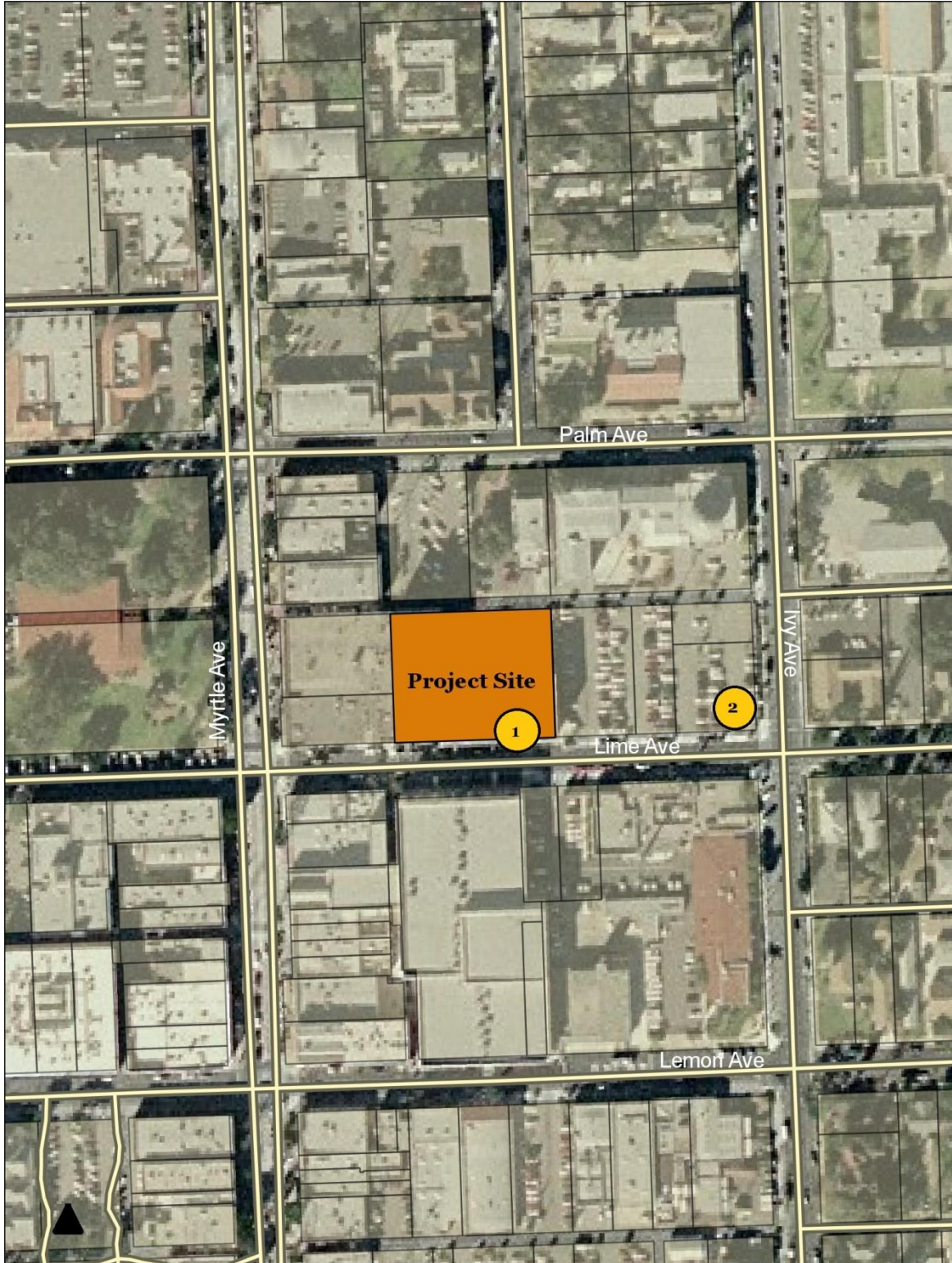


EXHIBIT 3-6
NOISE MEASUREMENT LOCATIONS
SOURCE: QUANTUM GIS

**Table 3-10
 Noise Measurement Results**

Noise Metric	Noise Level (dBA) for Location 1	Noise Level (dBA) for Location 2
L _{max} (Maximum Noise Level)	61.3 dBA	71.4 dBA
L ₉₉ (Noise levels <99% of time)	60.7 dBA	69.8 dBA
L ₉₀ (Noise levels <90% of time)	56.7 dBA	61.0 dBA
L ₇₅ (Noise levels <75% of time)	54.1 dBA	59.1 dBA
L ₅₀ (Noise levels <50% of time)	51.5 dBA	55.0 dBA
L _{min} (Minimum Noise Level)	49.2 dBA	48.9 dBA
Average Noise Level	52.5 dBA	55.7 dBA

As shown in Table 3-10, the average noise levels during the measurement period were 52.5 dBA for Location 1 and 55.7 dBA for Location 2. According to Figure 2 of the City’s Noise Element of the General Plan, the site is located within a “Normally Acceptable” dB zone. Therefore, the operation of the proposed project will not expose future employees to excessive noise levels.

Interior noise generated within the commercial units and the self-storage building will be attenuated by the building’s shell. The building is mostly comprised of brick and concrete, which will reduce noise levels by up to 25 dBA.⁹³ As a result, operational noise generated within the building will not negatively affect the aforementioned sensitive receptor.

Noise generated within the parking lot will include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA; car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. These distances represented the average distance from the noise source to the property line. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning. As indicated previously, the nearest sensitive receptor is located 317 feet from the project site. As a result, noise emanating from the parking lot will not affect the aforementioned sensitive receptor since noise generated within the parking lot will be subject to spreading loss.

Based on the principles of spreading loss, noise levels 50 feet from a source decrease by approximately 3.0 dBA over a hard, unobstructed surface, such as asphalt, and by approximately 4.5 dBA over a soft surface, such as vegetation. For every doubling of distance thereafter, noise levels drop another 3.0 dBA over a hard surface and 4.5 dBA over a soft surface. As a result, the impacts from the proposed project’s operation will be less than significant with the implementation of the construction mitigation identified previously in the subsection.

⁹³ California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. Report dated 2013.

B. Would the project result in a generation of excessive ground-borne vibration or ground-borne noise levels? • Less than Significant Impact.

The proposed project is a request to adaptively reuse an existing commercial building. As indicated by the model, the proposed project's construction will average 81.4 dBA at the United Methodist Church. Furthermore, no impact generating devices will be used during the proposed project's construction, which will minimize the amount of vibration the church will be exposed to. Once operational, the proposed project's traffic will not be significant enough to result in a doubling of traffic volumes. The Noise Element of the City's General Plan contains daily traffic counts for various roadway segments in the City. Main access to the project site will be provided by Myrtle Avenue, which is located 140 feet to the west of the project site. As indicated in Table 3 – Traffic Data in the City's Noise Element, Myrtle Avenue handled an average of 11,955 trips per day between Colorado Boulevard and Foothill Boulevard. The amount of new trips that is anticipated to be generated by the proposed project will not be enough to lead to a doubling of traffic volumes on the aforementioned street. As a result, the impacts from the proposed project's operation will be less than significant.

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? • No Impact.

The project site is not located within two miles of a public airport. As a result, the proposed project will not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people residing or working in the project area and no impacts will occur.

3.13.2 MITIGATION MEASURES

The analysis determined that the proposed project will require the following mitigation measures:

Mitigation Measure No. 2 (Noise). 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 will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will 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.

Mitigation Measure No 3 (Noise). Construction will be prohibited from occurring on Sundays.

3.14 POPULATION & HOUSING

3.14.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?* • *No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The project site is currently occupied by a former Frontier Communications office.
- *Extension of roadways and other transportation facilities.* The proposed project will utilize the existing roadways, driveways, and sidewalks.
- *Extension of infrastructure and other improvements.* The proposed project will utilize the existing infrastructure. The installation of these new utility lines will not lead to subsequent development.
- *Major off-site public projects (treatment plants, etc.).* The proposed project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere.* The site is currently occupied by an office building, and there are no housing units located on-site.
- *Additional population growth leading to increased demand for goods and services.* The proposed project will not lead to any direct increase in the City's population since no housing will be provided.
- *Short-term growth-inducing impacts related to the project's construction.* The proposed project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize existing roadways and infrastructure. The new utility lines that will be provided will not extend into undeveloped areas and will not result in unplanned growth. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Monrovia is projected to add a total of 3,600 new jobs through the year 2040.⁹⁴ The proposed self storage use and the future commercial tenants will result in a generation of up to 23 new jobs. The storage component will employ approximately five employees though no more than two employees will be on-site at any given time.⁹⁵ The tenants that will occupy the commercial units are not yet known. In addition, the hours of operation cannot be determined until a tenant has been found. The commercial component of the proposed project is estimated to add 18 new jobs based on a ratio of 25.76 employees per acre.⁹⁶ The projected number of new jobs is well within SCAG's employment projections for the City of Monrovia. Furthermore, the proposed project will not lead to any direct increase in the City's population since no housing units are proposed. In addition, the number of new jobs that will be created is within the employment generation estimated by SCAG. As a result, no impacts will occur.

B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.

No housing units will be displaced as a result of the proposed project's implementation. The site is currently occupied by an office building and there are no housing units located on-site. Therefore, no impacts will result.

3.14.2 MITIGATION MEASURES

The preceding analysis determined that no impacts to population and housing will result from the proposed project's implementation. As a result, no mitigation is required.

⁹⁴ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

⁹⁵ Based on a ratio of 0.06 employees per 1,000 square feet derived from the SANDAG.

⁹⁶ The Natelson Company, Inc. *Employment Density Study Summary Report.* October 31, 2001.

3.15 PUBLIC SERVICES

3.15.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project 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: Fire protection services; Police protection; Schools; Parks; other Governmental facilities? • Less than Significant Impact.*

Fire Services

The proposed project is a request to adaptively reuse an existing commercial building. The project Applicant will be required to comply with the most recent Building and Fire Code, which will require the developer to install sprinklers, emergency signage, alarms, and smoke obstructing fillers/materials. The City of Monrovia Department of Fire and Rescue provides fire protection and emergency services throughout the City. The Department engages in functions such as fire prevention, fire suppression, pre-hospital emergency care, pre-fire planning, training, apparatus maintenance and communications support.⁹⁷ The closest fire station is located approximately 300 feet south of the project site along the north side of Lemon Avenue.⁹⁸

The proposed project will be subject to review and approval by the Monrovia Department of Fire and Rescue to ensure that safety and fire prevention measures are incorporated into the project. As part of the project review process, the Monrovia Department of Fire and Rescue will review the proposed project and make recommendations for fire protection services and fire flow rates. Depending on the outcome of the review, any required improvements to the water system (e.g. additional hydrants) will be provided at the expense of the Applicant. In addition, the proposed project will comply with all applicable State and local codes and ordinances related to fire protection. The proposed project will not negatively impact fire protection services because the proposed project will be constructed in accordance with the most recent fire and building codes. In addition, the implementation of the proposed project will not impact Department response times or performance.⁹⁹ As a result, the impacts will be less than significant.

Police Services

Law enforcement services are provided by the Monrovia Police Department (MPD). The proposed project will only place an incremental demand on police protection services since the proposed project is not anticipated to be an attractor for crime due to the lack of unsecure open space. The Police Department will review the site plan for the proposed project to ensure that the development adheres to the Department requirements. Specifically, all security gates, monitoring systems, alarms, and walls will

⁹⁷ City of Monrovia. *Fire Department – Operations*. <https://www.cityofmonrovia.org/your-government/fire-department/about-us/divisions/operations>

⁹⁸ Google Earth. Website accessed April 22, 2019.

⁹⁹ Phone conversation with the Department's Inspector.

be under department review. Adherence to the abovementioned requirement will reduce impacts to levels that are less than significant.

Schools

Due to the nature of the proposed project (commercial and self-storage), no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. Any potential population growth that would lead to an increase in demand for school services will be indirect and will result from permanent employment growth. As a result, less than significant school-related impacts will occur.

Other Governmental Services

No new governmental services including additional parks and recreational services will be needed, and the proposed project will not have any impact on existing governmental services. The proposed project will not directly increase demand for governmental services. As a result, less than significant impacts will occur.

3.15.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to public services will result from the proposed project's implementation. As a result, no mitigation is required.

3.16 RECREATION

3.16.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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? • No Impact.

The City of Monrovia Parks and Recreation Department operates eight parks totaling over 116 acres. The City currently has a ratio of 0.9 acres of parkland per 1,000 people, or 33.5 acres for 37,285 residents. The nearest park is Library Park, located approximately 230 feet to the west of the site along the west side of Myrtle Avenue. The proposed project will not result in a direct demand for park facilities based on the proposed use. As a result, no changes in the demand for local parks and recreation facilities will occur.

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? • No Impact.

The proposed project will not result in a direct demand for park facilities. In addition, the proposed project will not provide any recreational facilities. As a result, no changes in the demand for local parks and recreation facilities will occur and no impacts will result with the proposed project's implementation.

3.16.2 MITIGATION MEASURES

The preceding analysis determined that no impacts to recreation will result from the proposed project's implementation. As a result, no mitigation is required.

3.17 TRANSPORTATION

A Parking Demand Study was prepared by Fehr and Peers dated December 20, 2018 (Revised August 7, 2019). A Trip Generation Study dated February 7, 2019 (Revised August 7, 2019) was also prepared for the proposed project. These studies are referenced throughout this Section and are included in Appendix D.

3.17.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? • Less than Significant Impact.*

A Trip Generation Study dated February 7, 2019 (revised August 7, 2019) was prepared for the project by Fehr and Peers. This document is included in Appendix D. According to the Trip Generation Study, the building's previous tenant generated an average of 1,038 trips per day, with 172 trips occurring during the morning peak hour and 170 trips occurring during the evening peak hour.¹⁰⁰ Once occupied, the proposed project will generate 220 trips per day, with 20 trips occurring during the morning peak hour and 29 trips occurring during the evening peak hour.¹⁰¹ Based on the ITE trip generation estimates, the proposed project will generate about 80 percent fewer daily trips, 90 percent fewer morning peak period trips and 85 percent fewer evening peak period trips than the existing single-tenant office building use. The reduction in the number of trips is primarily due to the self-storage facility use, which generates significantly fewer trips per thousand square feet than the building's previous use. As a result, the impacts will be less than significant.

B. *For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3*

¹⁰⁰ Fehr and Peers. *Trip Generation Study*. Study dated February 7, 2019 (revised August 7, 2019).

¹⁰¹ Ibid.

subdivision (b)(1)? • Less than Significant Impact.

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

It is important to note that the proposed project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the proposed project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).¹⁰² Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the impacts will be less than significant.

C. Would the project substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • Less than Significant Impact.

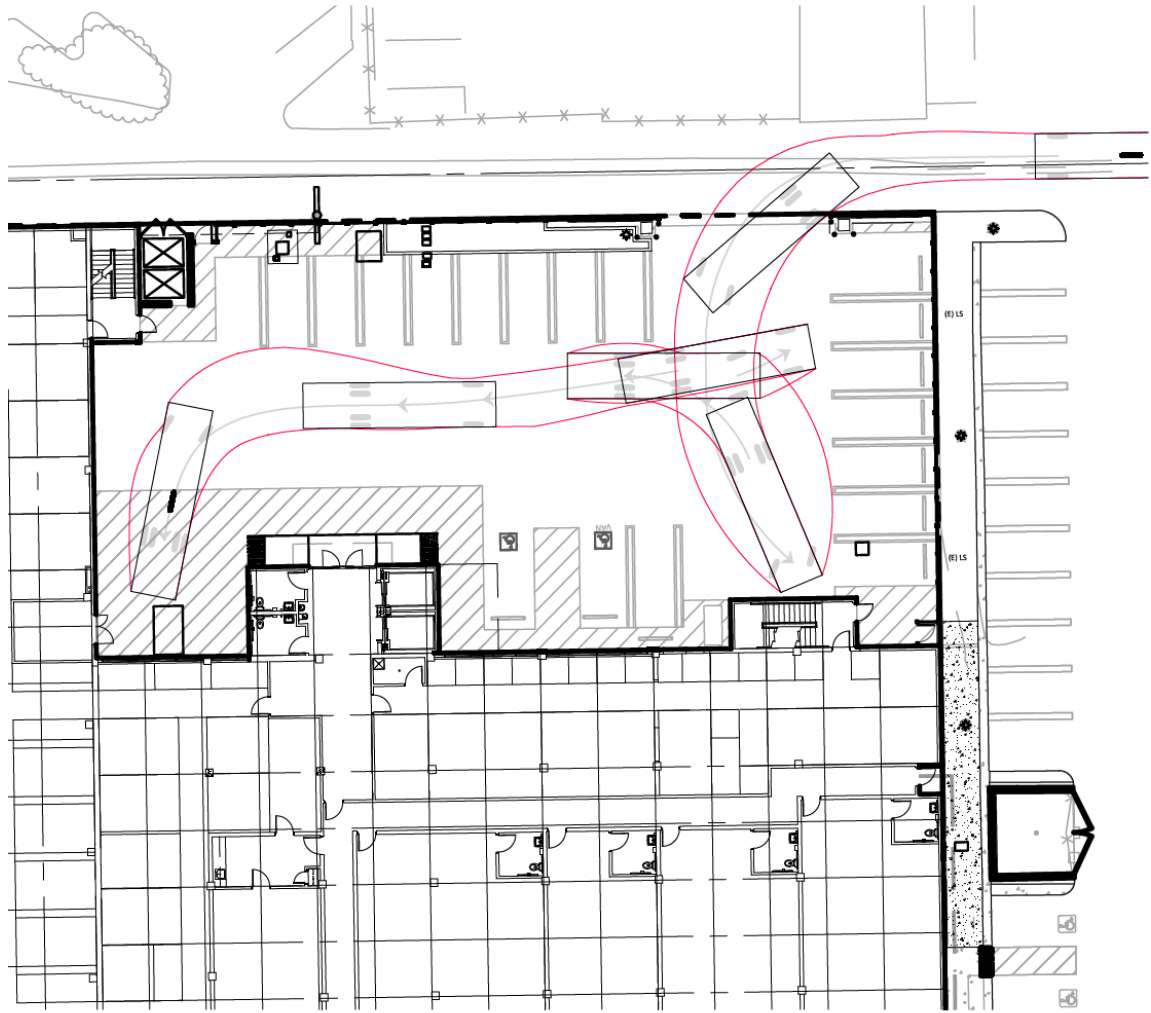
Access to the project site is provided by a drive way connection located along the project site’s northern boundary. The project site will be accessible for passenger vehicles as well as for U-Haul trucks. Adequate maneuvering space for U-Haul trucks is available on-site (refer to Exhibit 3-7). The proposed project will not expose future employees or patrons to hazardous conditions since adequate sight distance and gap time (the time between each passing vehicle and/or truck) is provided exiting the project site onto both Ivy Avenue and Lime Avenue. As a result, less than significant impacts will occur.

D. Would the project result in inadequate emergency access? • No Impact.

The proposed project’s construction will be minimal and will be confined to the project site. Construction vehicles will be parked on-site during the construction phase and will not block any of the adjacent streets. Once operational, patrons will park in the parking lot, which will contain an adequate amount of spaces to accommodate demand.¹⁰³

¹⁰²California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is an objective of the SGC because infill furthers many of the goals of the Council’s member agencies.

¹⁰³ Fehr and Peers. *Parking Study*. Study dated December 20, 2018 (revised August 7, 2019).



SCALE: 1" = 30'

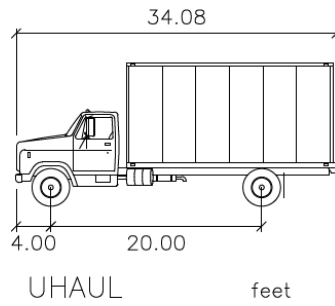


EXHIBIT 3-7
TRUCK TURNING MAP
SOURCE: FEHR AND PEERS

Thus, patrons will not have to double park their vehicles and none of the adjacent streets will be blocked by the patrons' vehicles. In addition, the site has capacity to accommodate U-Haul truck maneuvering and U-haul trucks will not protrude into any of the adjacent streets. As a result, no impact will occur.

3.17.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to transportation will result from the proposed project's implementation. As a result, no mitigation is required.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: 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 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 Resource 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? • Less than Significant Impact.*

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a)

As indicated in Section 3.5, AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation.

AB-52 consultation was undertaken by the City. The City received one email response from the Gabrieleño-Kizh dated April 17, 2019. This email response is provided in Appendix C. The tribal representative of the Gabrieleño-Kizh indicated that the project site is located in the midst of an urban area and that the project has a low potential to impact Tribal Cultural Resources (TCR). Therefore, additional mitigation for monitoring for TCR’s is not necessary for the proposed project and no impacts will result. In the unlikely event that remains are uncovered by construction crews and/or the Native American Monitors, all excavation and grading activities shall be halted and the Monrovia Police Department will be contacted (the Department will then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA and California Health and Safety Code Section 7050.5(b) will apply in terms of the identification of significant archaeological resources and their salvage. As a result, the impacts will be less than significant.

3.18.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts to tribal cultural resources will result from the proposed project’s implementation. As a result, no mitigation is required.

3.19 UTILITIES & SERVICE SYSTEMS

3.19.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts?* • *Less than Significant Impact.*

The on-site building was previously occupied by Frontier Communications, though the building is currently vacant. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project’s implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for waste disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). As a result, the impacts will be less than significant.

B. *Would the project have sufficient water supplies available to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years?* • *Less than Significant Impact.*

Water service in Monrovia is provided by the City of Monrovia’s Public Works Department. According to the City’s 2015 Urban Water Management Plan, the City will have an adequate supply of water to meet the projected demand under a normal year scenario, a single dry-year scenario, and a multiple dry year scenario.¹⁰⁴

Table 3-11 shows the amount of water that will be consumed by the proposed project. According to Table 3-11, the proposed project is projected to consume 3,548 gallons of water on a daily basis. In order to be consistent with the Traffic Memorandums, 86,729 square feet dedicated to self-storage uses and 5,520 square feet of commercial space (including the 984 square feet commercial hallway) was analyzed. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative.

The previous tenant’s daily water consumption is provided in Table 3-11. As shown in the table, the previous use consumed an average of 23,062 gallons of water per day (the previous use was also estimated to employ over 50 office workers). The proposed project will result in a net decrease of 19,514 gallons per day in water consumption. This is due to the nature of the proposed project (a majority of the building will consist of storage space and the proposed project will employ fewer individuals than the building’s previous use).

**Table 3-11
 Water Consumption (gals/day)**

Use	Unit	Factor	Generation
Previous Use			
Office	92.249 ksf	250 gals/1,000 sq. ft.	23,062 gals/day
Total			23,062 gals/day
Proposed Project			
Personal Self-Storage	86.729 ksf	25 gals/1,000 sq. ft.	2,168 gals/day
Office	5,520 ksf	250 gals/1,000 sq. ft.	1,380 gals/day
Total	92,249 sq. ft.		3,548 gals/day
Net Change			-19,514 gals/day

Source: City of Los Angeles CEQA Thresholds Guide for Personal Self Storage and LACSD for office.

The proposed project will include water efficient fixtures and drought tolerant landscaping, which will reduce the amount of water that will be consumed. As a result, the impacts will be less than significant.

¹⁰⁴ Stetson Engineers, Inc. *City of Monrovia 2015 Urban Water Management Plan*. Report dated 2016.

C. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? • Less than Significant Impact.

The City of Monrovia is located within District 15 of the Los Angeles County Sanitation District (LACSD). The Sanitation Districts own, operate, and maintain approximately 1,400 miles of sewers, ranging from 8 to 144 inches in diameter, that convey approximately 500 million gallons per day of wastewater to 11 wastewater treatment plants.¹⁰⁵ Wastewater will typically be conveyed to either the San Jose Creek Water Reclamation Plant (WRP) or the Whittier Narrows WRP, though wastewater collected within the Los Angeles County Sanitation District may be conveyed and treated at any of the County treatment plants. The San Jose Creek WRP provides primary, secondary, and tertiary treatment for 100 million gallons of wastewater per day. The plant serves a population of approximately one million residents throughout Los Angeles County. Approximately 42 million gallons per day of reclaimed water is reused at over 130 different reuse sites, while the remainder is discharged into the San Gabriel River. The Whittier Narrows WRP provides primary, secondary, and tertiary treatment for 15 million gallons of wastewater per day.¹⁰⁶ Table 3-12 indicates the future wastewater generation in gallons per day. According to Table 3-12, the proposed project is estimated to generate approximately 2,562 gallons of sewage per day, well within the daily average totals for the San Jose Creek WRP or the Whittier Narrows WRP. It is important to note that the 5,520 square feet of commercial space (including the 984 square feet commercial hallway), was analyzed entirely as office in an effort to be more conservative.

The previous tenant’s daily wastewater generation is provided in Table 3-12. As shown in the table, the previous use produced an average of 13,837 gallons of wastewater per day (the previous use was also estimated to employ over 50 office workers). The proposed project will result in a net decrease of 11,275 gallons per day in wastewater generation. This is due to the nature of the proposed project (a majority of the building will consist of storage space and the proposed project will employ fewer individuals than the building’s previous use).

**Table 3-12
 Wastewater (Effluent) Generation (gals/day)**

Use	Unit	Factor	Generation
Previous Use			
Office	92.249 ksf	150 gals/1,000 sq. ft.	13,837 gals/day
Total			13,837 gals/day
Proposed Project			
Personal Self-Storage	86.729 ksf	20 gals/1,000 sq. ft.	1,734 gals/day
Office	5.520 ksf	150 gals/1,000 sq. ft.	828 gals/day
Total	92,249 sq. ft.		2,562 gals/day
Net Change			-11,275 gals/day

Source: City of Los Angeles CEQA Thresholds Guide for Personal Self Storage and LACSD for office.

¹⁰⁵ Los Angeles County Sanitation District. *Wastewater Collection Systems*. Website accessed April 24, 2019.

¹⁰⁶ Ibid.

The proposed project will connect to an existing sewer line located along Lime Avenue. Therefore, the existing sewer line has sufficient capacity to accommodate the projected flows. Adequate sewage collection and treatment are currently available at the aforementioned WRPs. Therefore, proposed project implementation will not exceed wastewater treatment requirements and the impacts will be less than significant.

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? • Less than Significant Impact with Mitigation.

Athens Services will provide solid waste collection for the proposed project. According to a representative of Athens Services, the proposed project will be supplied with a three yard bin that will be collected three times per week.¹⁰⁷ Three yard dumpsters typically have a capacity of 500 pounds of waste.¹⁰⁸ Assuming Athens Services collects solid waste three times per week, the proposed project is estimated to produce 1,500 pounds of solid waste per week, or approximately 214 pounds of solid waste per day, which totals 78,000 pounds (39 tons) annually. According to the Los Angeles County Department of Public Works, the citywide total for solid waste generation as of the end of the second quarter has been 1,072.87 tons this year.¹⁰⁹ Assuming an annual citywide generation of 4,288 tons per year of solid waste, the proposed project's total annual generation will be less than one percent of the annual citywide total.¹¹⁰

Trash collection is provided by Athens Services for disposal into area landfills. Waste is then transferred to either the Mesquite Regional Landfill in Imperial County or to the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Los Angeles County Sanitation District selected the Mesquite Regional Landfill in Imperial County as the new target destination for the County's waste (as an alternative to the closed Puente Hills landfill). The Mesquite Regional Landfill in Imperial County has a 100-year capacity at 8,000 tons per day. The Puente Hills Transfer Station and MRF is able to accept 4,440 tons per day of solid waste. The amount of solid waste that will be generated by the proposed project is not significant and will be accommodated by the aforementioned landfill. As indicated previously, the proposed project will generate approximately 214 pounds of solid waste per day, or 0.10 tons per day. The amount of solid waste that will be generated will take comprise less than one percent decrease of the total daily capacity for the Mesquite Regional Landfill and the Puente Hills Transfer Station. Nevertheless, Mitigation Measure No.4 will be required to ensure waste is collected on a regular basis.

¹⁰⁷ Email communication between the Applicant, Mr. William McPhee, and Mrs. Kathy Collett. Email dated January 24, 2019.

¹⁰⁸ California Waste Services. *3-Yard Roll-off Dumpsters*. <https://www.californiawasteservices.com/3-yard-dumpsters.html>

¹⁰⁹ Los Angeles County Department of Public Works. *Yearly In-County Jurisdictions Solid Waste Disposal Report (Including Exports) By In-County Facilities*. Site accessed July 23, 2019.

¹¹⁰ The estimate of the annual citywide total for solid waste was generated by multiplying the quarterly total for the first quarter by four (4 quarters in a year) (1,072.87 tons for the first quarter x 4 quarters=4,288 tons per year).

- E. *Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.*

The proposed project, like all other development in Monrovia, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste will occur.

3.19.2 MITIGATION MEASURES

The preceding analysis determined that the following mitigation will be required:

Mitigation Measure No 4 (Utilities). A trash generation study shall be completed to determine the initial pick-up frequency. Trash pickup shall be scheduled with enough frequency to ensure that the provided dumpster does not overflow.

3.20 WILDFIRE

3.20.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? • Less than Significant Impact.*

According to the City's Community Wildfire Protection Plan, the project site is located within a "Safety Zone" and no areas containing natural vegetation is located near the project site. In addition, the project site is located approximately three-quarters of a mile southeast of the nearest Fire Hazard Severity Zone.^{111, 112} Furthermore, the proposed project will not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. As a result, less than significant impacts will occur.

- B. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • Less than Significant Impact.*

The project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the adjacent properties. The proposed project may be exposed to criteria pollutant emissions generated by wildland fires due to the project site's proximity to fire hazard severity zones (the site is located 1.25 miles south of the San Gabriel Mountains). However, the impacts will not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire

¹¹¹ CalFire. *Very High Fire Hazard Severity Zones in Local Responsibility Area (LRA) for the City of Monrovia*. Site accessed July 23, 2019. <https://osfm.fire.ca.gov/media/5832/monrovia.pdf>

¹¹² Google Earth. Site accessed July 23, 2019.

City as well as the surrounding cities and unincorporated county areas. As a result, the impacts will be less than significant.

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

The proposed project will include the installation of new utility lines such as gas lines, water lines, etc. These utilities lines will be located below ground surface, which would reduce the likelihood of a fire igniting. As a result, the impacts are considered to be less than significant.

D. *Expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • Less than Significant Impact.*

There is no risk from wildfire within the project site given the project site's distance from any area that may be subject to a wildfire event. The project site and the surrounding properties are developed and urbanized. Nevertheless, the site is located more than 1.25 miles south of the base of the San Gabriel Mountains. Any wildfire burning in the nearby San Gabriel Mountains will have the potential to incinerate the native forest, thus exposing barren slopes. A major rainstorm event following a wildfire in the local mountains may result in flooding and mudslides. Should this event occur, the impacts will be less than significant since this scenario will create citywide impacts.

3.20.2 MITIGATION MEASURES

The preceding analysis determined that less than significant impacts regarding wildfires will result from the proposed project's implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? • Less than Significant Impact with Mitigation.*

The proposed project will degrade the quality of the environment since the proposed project's air quality emissions will be below the thresholds of significance outlined by the SCAQMD. In addition, the project Applicant will be required to implement Mitigation Measure No.1 and Standard Conditions 1 through 3, which will minimize the degradation of the local environment. Furthermore, Stormwater runoff is

regulated under Chapter 12.36 - Stormwater and Urban Runoff Pollution Control of the City's Municipal Code. The project Applicant will be required to implement Low Impact Development (LID) measures, also known as Best Management Practices (BMPs) into the project's design. These operational Best Management Practices (BMPs) will reduce the volume of water discharged into the local storm drains and will filter out any contaminants present in the stormwater runoff. Therefore, the proposed project will not degrade the quality of local groundwater or surface water resources. Furthermore, no impacts to protected species or habitat will result with the implementation of the proposed project. The project site is completely paved over and is occupied by an existing on-site office building. No rare or endangered species were encountered during the field survey that was undertaken for the project site. Lastly, the building that currently occupies the site is not a historical building and is not located within a historic district. Therefore, less than significant impacts will occur with the implementation of the mitigation measures and Standard Conditions identified throughout Section 3.

- *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?* • *Less than Significant Impact.*

The proposed project's cumulative emissions will be less than significant. As indicated in Tables 3-1, 3-2, and 3-7, the proposed project's air quality and GHG emissions will be under the thresholds of significance established by the SCAQMD. When examined in a cumulative city-wide context, the proposed project's air quality and GHG emissions will be less than significant. The proposed project is an infill development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the proposed project is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC). Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. In addition, the Applicant will be required to incorporate any fire or police department recommendations into the site plan. Furthermore, the proposed project's cumulative traffic impacts will be less than significant since the project will result in fewer trips than the former office use. Therefore, less than significant impacts will result.

- *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?* • *Less than Significant Impact with Mitigation.*

The proposed project's implementation will not result in environmental effects that would have direct or indirect impacts to human beings with the implementation of Standard Conditions 1 through 3, which will control fugitive dust, LBP/ACM/ACCM's, and VOC's; Mitigation Measure No.1, which will ensure no LBP/ACM/ACCM's will be released during the building's remodel phase; Mitigation Measure No.2, which contains numerous construction noise abatement measures; Mitigation Measure No.3, which prohibits constructions on Sundays (so as to not interfere with Sunday services at the nearby church); and Mitigation Measure No.4, which ensures trash is collect three times per day to prevent the build-up up refuse. Adherence to the aforementioned mitigation measures and Standard Conditions will ensure no impacts to human beings will occur.

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SECTION 4.0 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project will not result in significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have a significant effect on the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.
- A Mitigation Reporting and Monitoring Program *will be* adopted.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Mitigated Negative Declaration, which relates to the Mitigation Monitoring and Reporting Program. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Monrovia can make the following additional findings:

- A mitigation reporting or monitoring program will be required; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigation measures adopted as part of the decision-maker's final determination.

A number of Standard Conditions and mitigation measures have been recommended as a means to reduce or eliminate potential adverse environmental impacts to insignificant levels. AB-3180 requires that a monitoring and reporting program be adopted for the recommended mitigation measures and Standard Conditions.

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5.2 REFERENCES

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APPENDICES
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