



**City of Monrovia  
2021-2029 Housing Element Update, Safety Element Update,  
New Environmental Justice Element, and  
Zoning Text Amendment  
State Clearinghouse #: 2022080729**

**Final Initial Study and  
Mitigated Negative Declaration**

**Lead Agency**

City of Monrovia  
Planning Division  
415 South Ivy  
Monrovia, California 91016

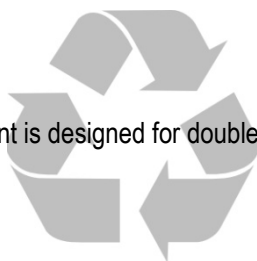
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FINAL IS/MND  
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## 1 PURPOSE AND AUTHORITY

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The purpose of this Initial Study is to identify and evaluate the physical effects on the environment associated with implementation of the City of Monrovia 2021-2029 Housing Element Update, Safety Element Update, and new Environmental Justice Element of the General Plan, and Zoning Text Amendment. Pursuant to the California Environmental Quality Act (CEQA), the proposed Housing Element Update, Safety Element Update, Environmental Justice Element, and Zoning Text Amendment are considered a "Project" and thus requires analysis and determination of potentially significant environmental effects prior to approval. For this analysis, these four components together are referred to as "the Project," "the proposed Project," or "proposed Project."

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) Statutes and Guidelines and the City of Monrovia local rules and regulations. The proposed Project requires discretionary approval by the City of Monrovia and review by the California Department of Housing and Community Development (HCD). As the project initiator, and because of the legislative approvals involved, the City of Monrovia is the Lead Agency with respect to this Initial Study pursuant to §15367 of the CEQA Guidelines. Specifically, the Project requires City of Monrovia approval of General Plan Amendments GPA2022-0002, GPA2022-003, and GPA2022-0004. No other governmental agencies have discretionary permitting authority with respect to approval of the proposed Project, and no Trustee Agencies, as defined in §21070 of the CEQA Statutes, has jurisdiction over resources such that Trustee agency approval is required for entitlement approval.

Pursuant to §15074 of the CEQA Guidelines, prior to approving the Project, the City of Monrovia is obligated to consider the findings of this Initial Study and to either adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) or determine that an Environmental Impact Report (EIR) is required due to potentially significant, unavoidable environmental impacts. The findings of this Initial Study support adoption of an MND. The potential environmental impacts of this project, which includes an updated Housing Element, an updated Safety Element, a new Environmental Justice Element, and Zoning Text Amendments, would be less than significant and that an EIR is not required.

### CONTENTS

The following briefly describes the sections within the Initial Study (IS):

- Section 1.0: Purpose and Authority, provides an introduction to the IS, describes the purpose of CEQA, identifies the organizational format of this IS, and describes the use of tiering in a CEQA document.
- Section 2.0: Project Description, describes the proposed Project and provides a description of proposed discretionary actions required for Project implementation.
- Section 3.0: Determination, summarizes the environmental impacts identified in the IS and the determination that an MND is the appropriate CEQA document.
- Section 4.0: Evaluation of Environmental Impacts, presents a summary of the results of the environmental evaluation for the proposed Project.
- Section 5.0: List of Preparers, summarizes those involved in the preparation of the document.
- Section 6.0: References, provides a list of references used in preparation of this document.

### TIERING

Section 15152 et al of the CEQA Guidelines describes "tiering" as a streamlining tool as follows:

- (a) *"Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the*

general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

- (b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.
- (c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.
- (d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:
  - (1) Were not examined as significant effects on the environment in the prior EIR; or
  - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
- (e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.
  - (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration and need not be discussed in detail.
  - (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).
  - (3) Significant environmental effects have been "adequately addressed" if the lead agency determines that:
    - (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

- (B) *they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.*
- (g) *When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.*
- (h) *There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:*

  - (1) *General Plan EIR (Section 15166)*
  - (2) *Staged EIR (Section 15167)*
  - (3) *Program EIR (Section 15168)*
  - (4) *Master EIR (Section 15175)*
  - (5) *Multiple-family residential development/residential and commercial or retail mixed-use development (Section 15179.5)*
  - (6) *Redevelopment project (Section 15180)*
  - (7) *Projects consistent with community plan, general plan, or zoning (Section 15183)*

This Initial Study for the 2021-2029 Housing Element Update, Safety Element Update and Environmental Justice Element and Zoning Text Amendment has been prepared to tier from the General Plan Land Use and Circulation Elements EIR (General Plan EIR) of the City of Monrovia, as amended or otherwise supplemented. The General Plan EIR includes both the Draft EIR (dated September 2007) and the Final EIR (dated January 2008). For the City of Monrovia, documents by which the analysis recorded herein has been tiered from are available for public review at:

City of Monrovia  
Planning Division  
415 South Ivy  
Monrovia, California 91016

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## 2 PROJECT DESCRIPTION

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### **PROJECT TITLE**

#### **Project Title**

City of Monrovia 2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment

#### **Lead Agency/Project Sponsor Name and Address**

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#### **The Project**

This Initial Study (IS) analyzes the potential environmental impacts associated with:

- Adoption of the City of Monrovia's sixth cycle (2021-2029) Housing Element
- Adoption of an update to the City of Monrovia's Safety Element
- Adoption of a new Environmental Justice Element
- Zoning Text Amendment

The Housing Element is a required component of the City's General Plan and must be updated on a regular basis, as set forth in Government Code Sections 65580 – 65589.8.8. The Housing Element consists of these components, described in detail below: 1) housing needs, 2) constraints to housing development, 3) housing resources (available sites and funding sources), 4) a housing plan, and 5) affirmatively furthering fair housing.

The 2021-2029 Housing Element applies to all properties within the City of Monrovia on which existing and proposed General Plan land use designations and zoning districts allow residential and/or mixed-use development. The Housing Element does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. The Housing Element is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). For the 2021-2029 planning period, the City of Monrovia's share is 1,670 housing units. This allocation is referred to as the Regional Housing Needs Assessment, or RHNA.

In conjunction with this Housing Element Update, the City is also undertaking an update to the Safety Element to align it with recently enacted State Laws and adopt new climate adaptation and wildfire strategies. A new Environmental Justice Element was prepared to comply with SB 1000 and SB 244. Zoning text amendments are also proposed to meet State law requirements. A detailed description of the components of the General Plan elements and zoning text amendment are provided within this chapter.

Since these policy documents do not specifically authorize the construction of any development, nor do these documents specifically indicate where and when specific housing projects will occur, this IS examines the potential environmental impacts only at a programmatic level.

***Project Location***

The City of Monrovia and its unincorporated Sphere of Influence (“planning area”) lies within the San Gabriel Valley in Los Angeles County, along the base of the San Gabriel Mountains. The City covers an area of approximately 14 square miles and is bounded by Arcadia to the west, Angeles National Forest to the north, Bradbury and Duarte to the east, and unincorporated Los Angeles County and Irwindale to the south. Interstate 210 (I-210) and Foothill Boulevard – a major east-west San Gabriel Valley arterial – traverses the city. Exhibit 1 shows the location of the City.

***General Plan Designations***

The Monrovia General Plan provide for a range of land use designations/zones in the city that can accommodate residential units. Multiple residential and commercial General Plan land use designations within the City provide opportunities for development of housing projects, including: Residential Foothill, Residential Estate, Residential Low Density, Residential-Medium Density, Residential-High Density, Retail Corridor Mixed Use, Planned Development, and Specific Plan/Planned Development Overlay. The 2021-2029 Housing Element Update, Safety Element Update, new Environmental Justice Element, and Zoning Text Amendments do not propose to change any parcel’s General Plan land use designation.

***Zoning Districts***

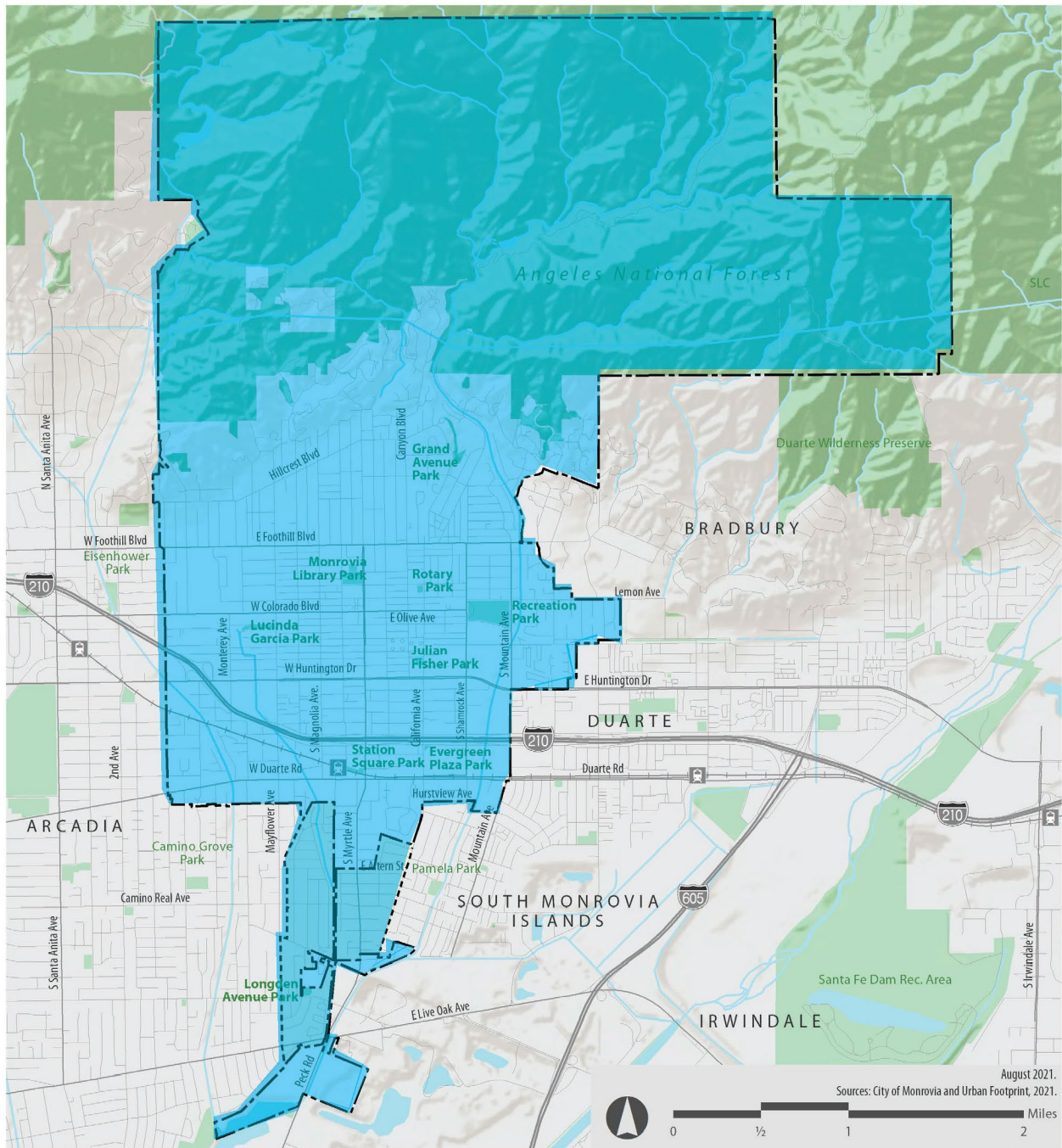
Multiple residential and commercial zones within the city provide opportunities for development of housing projects at various densities. Residential density within the various zones is calculated at dwelling units per acre (du/acre). Residential uses are permitted in the following zones: Residential Foothill (RF), Residential Estate (RE), Residential Low Density (RL), Residential Medium Density (RM), Residential Medium/Residential High Density (RM/RH), Residential High Density (RH). Multifamily residential uses are permitted as a conditional use in Neighborhood Commercial (NC), and Retail Corridor Mixed Use (RCM). Mobile homes are permitted in Manufacturing (M) with a conditional use permit. The 2021-2029 Housing Element Update, Safety Element Update, new Environmental Justice Element, and Zoning Text Amendment do not propose to change any particular parcel’s zoning.

**2021-2029 HOUSING ELEMENT UPDATE**







**Requirements and Content.** A Housing Element is one of the eight required General Plan elements. It addresses existing and future housing needs of persons of all income levels and provides policy guidance to decision-makers and City staff. The City is not required to construct housing to meet those needs, but it must create a regulatory environment that supports and encourages housing production and equal access to housing.

State law requires that all housing elements address five key topics: 1) housing needs, 2) constraints to housing development, 3) housing resources, 4) a housing plan, and 5) affirmatively furthering fair housing. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the California Government Code establishes the legal requirements for a housing element and encourages the provision of affordable and decent housing, in suitable living environments, in all communities, in working toward statewide goals. The 2021-2029 Housing Element Update is the policy document that addresses current and projected housing needs consistent with State law.

**Housing Needs and Resources.** Several factors influence the demand for housing in the City of Monrovia, including population growth, the cost of housing, and housing needs of "special needs groups" that include the elderly, large families, female-headed households, households with a physically or developmentally disabled person, farm workers, and the homeless. The 2021-2029 Housing Element Update examines the housing needs of different groups of people based on demographic metrics that include owners versus renters, lower-income households, overcrowded households, elderly households, special needs groups, and homeless persons.



**Base Map Features**

-  City of Monrovia Boundary
-  Sphere of Influence
-  Metro Rail line and Stations
-  Major Streets
-  Parks and Open Space
-  Waterbodies



**Monrovia**  
Mitigated Negative Declaration

**Location Map**

**Exhibit 1 Location Map**

Housing, Safety and Environmental Justice Elements Update IS/MND  
Monrovia, California



California housing element law requires that each city and county develop local housing programs designed to meet its “fair share” of housing needs for all income groups, based on projected population growth. The California Department of Housing and Community Development (HCD), Housing Policy Division develops the Regional Housing Needs Allocation (RHNA) for each region of the State represented by councils of governments. In Southern California (exclusive of San Diego County), the Southern California Association of Governments (SCAG) determines the housing allocation for its member cities and counties. SCAG has assigned the City of Monrovia a RHNA allocation of 1,670 housing units for the 2021-2029 planning period, divided among the household income categories identified in Table 1.

Housing units that have been approved or proposed but not yet built or that are under construction as of June 2021 may be credited toward the RHNA. Table 2 (RHNA Credits and Remaining Need) identifies RHNA credits and the remaining housing need to be accommodated by land use policy and zoning regulations.

**Table 1: City of Monrovia Regional Housing Needs Assessment Allocation**

Income Group	Total Allocation (DU)	Income Group Ratio (%)
Extremely Low/Very Low	519	31%
Low	262	16%
Moderate	254	15%
Above Moderate	635	38%
<b>Total</b>	<b>1,670</b>	<b>100%</b>
Source: SCAG 2021		

**Table 2: RHNA Credits and Remaining Need**

	Extremely/Very Low Income (0-50% AMI)*	Low Income (51-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (121+% AMI)	Total
<b>Sites</b>					
Approved/Proposed Projects	28	13	12	1,391	1,444
Sites Inventory	740	128	295	85	1,248
<i>Total</i>	<i>768</i>	<i>141</i>	<i>307</i>	<i>1,476</i>	<i>2,692</i>
2021-2029 RHNA	519	262	254	635	1,670
<b>Surplus/Shortfall (+/-)</b>	<b>+249</b>	<b>-121</b>	<b>+53</b>	<b>+841</b>	
Source: 2021-2029 Housing Element					

State law requires that jurisdictions demonstrate in the Housing Element that land inventory is available and adequate to accommodate the RHNA allocation. The City of Monrovia has determined that the inventory of non-vacant residential and mixed-use sites and estimated production of accessory dwelling units during the planning period is sufficient to accommodate the remaining RHNA in the below market rate categories. Sites currently available and appropriate to accommodate a portion of the RHNA are categorized and summarized in Table 3.

Table 3: Sites Inventory Summary

	Extremely*/ Very Low Income (0-50% AMI)*	Low Income (51- 80% AMI)	Moderate Income (80- 120% AMI)	Above Moderate Income (121+% AMI)	Total
<b>Sites</b>					
Accessory Dwelling Units*	67	128	8	85	288
Site 1: 145 W. Duarte Road	95	0	41	0	136
Site 2: Evergreen West	137	0	58	0	195
Site 3: Evergreen East	242	0	103	0	345
Site 4: Mayflower Avenue	57	0	25	0	82
Site 5: 341 W. Duarte Road	25	0	10	0	35
Site 6: 429 Genoa Street	15	0	7	0	22
Site 7: 435 Genoa Street	17	0	7	0	24
Site 8: 800 S. Myrtle Avenue	85	0	36	0	121
<i>Total Sites Inventory</i>	<i>740</i>	<i>128</i>	<i>295</i>	<i>85</i>	<i>1,248</i>
<b>RHNA Surplus/Shortfall (+/-) after Approved/Proposed Project sites applied</b>	<b>+249</b>	<b>-121</b>	<b>+53</b>	<b>+841</b>	

## Notes:

AMI: Area Median Income

Sites with densities over 30 units per acre are used to meet the lower-income RHNA. Government Code Section 65583.2(c)(3) states that if a local government has adopted default density standards (at least 30 units per acre for Monrovia), HCD is obligated to accept sites with those density standards as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. To create a more conservative estimate of affordability for the City, sites that can qualify for 100 percent affordable units based on the allowed density are split between the very low- and moderate-income categories (70 percent and 30 percent respectively).

\*Affordability for ADUs is divided according to SCAG-established and HCD-approved affordability estimates for ADUs in LA County II region: 15% extremely low-income, 8.5% very low-income, 44.6% low-income, 2.1% moderate-income, and 29.8% above moderate-income.

Source: 2021-2029 Housing Element

**Housing Constraints.** The Housing Constraints section identifies and addresses regulations and conditions that constitute constraints to housing production and preservation, including governmental and nongovernmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability. Where constraints were identified, programs to address those constraints were included in the Housing Plan.

**Affirmatively Furthering Fair Housing.** New for the 6th cycle and consistent with the Affirmatively Furthering Fair Housing (AFFH) mandate imposed by AB 686, a detailed analysis of segregation/integration patterns and disparities in access to opportunity is included in the Housing Element. The City of Monrovia contracts with the Housing Rights Center (HRC), a nonprofit organization dedicated to affirmatively furthering fair housing choice through the provision of education and direct client services. In response to this analysis, a program was included in the Housing Plan to update the existing Analysis of Impediments to Fair Housing Choice (2015) and to continue the City's efforts to affirmatively further fair housing.

## GOALS, POLICIES, AND PROGRAMS

The Housing Element Update includes the following goals and policies to direct housing decisions over the 2021-2029 planning period:

- **GOAL 1: Encourage a variety of housing types to meet the existing and future needs of Monrovia residents.**
  - Policy 1.1: Implement land use policies and standards that allow for a range of residential densities and products that will provide households of all types and income levels the opportunity to find suitable ownership and rental housing.
  - Policy 1.2: Provide site opportunities for development of housing that responds to diverse community needs in terms of housing types, cost, and location, emphasizing locations near services and transit that promote walkability.
  - Policy 1.3: Encourage and facilitate the development of mixed use and high-density residential development in appropriate areas (e.g., Station Square, Old Town Extension, along Huntington Drive).
  - Policy 1.4: Encourage infill development and recycling of land to provide needed housing.
  - Policy 1.5: Support the assembly of parcels to enhance the feasibility of infill development.
  - Policy 1.6: Facilitate the development of accessory dwelling units in all residential areas of the City.
  - Policy 1.7: In meeting housing needs, preserve important aspects of Monrovia, including hillsides and historic resources, sensitive habitats, and other distinctive features.
  
- **GOAL 2: Assist in the development of housing that meets the needs of the Monrovia community including low- and moderate-income and special needs households.**
  - Policy 2.1: Facilitate the development of affordable housing through regulatory incentives and concessions, and/or financial assistance. Proactively seek out new models and approaches in the provision of affordable housing.
  - Policy 2.2: Encourage the development of residential units and the provision of related services for special needs groups, including the elderly, large households, single parents, persons with disabilities, extremely low-income persons, and persons experiencing homelessness.
  - Policy 2.3: Encourage the inclusion of housing affordable to lower-income households when reviewing proposals for new housing developments.
  - Policy 2.4: Continue to require that housing for low- and moderate-income households not be concentrated in any single portion of the city.
  - Policy 2.5: Support regional efforts to develop affordable housing and address homelessness.
  - Policy 2.6: Work collaboratively with nonprofit, for-profit, and faith-based organizations in the community to address the housing and supportive services of residents and those with special housing needs.
  
- **GOAL 3: Reduce governmental constraints on the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities, while maintaining community character.**
  - Policy 3.1: Identify ways to reduce the review time of housing projects while maintaining adequate public involvement and fulfilling the appropriate requirements of state and local laws. Provide for priority and expedited treatment in planning processing for affordable and special needs housing.

- Policy 3.2: Support the use of density bonuses and other incentives, such as fee deferrals/waivers and parking reductions, to offset the costs of affordable housing and to minimize the effect of governmental constraints.
- Policy 3.3: Provide flexibility in development standards to accommodate new models and approaches to providing housing, such as transit-oriented development, mixed-use, co-housing and live/work housing.
- Policy 3.4: Periodically review and adjust, if needed, residential development standards, regulations, ordinances, departmental processing procedures, and residential fees related to the construction and rehabilitation of housing that are determined to constrain housing development or as a result of new or updated State and federal housing-related legislation.
- **GOAL 4: Preserve and improve the quality of existing neighborhoods and existing housing, especially affordable housing. Support sustainable solutions which minimize reliance on natural resources and automobile use.**
  - Policy 4.1: Preserve the character, scale and quality of established residential neighborhoods and ensure that new housing is well-designed and compatible with the neighborhood context in which it is located.
  - Policy 4.2: Encourage development and long-range planning that uses compact urban forms that foster healthy living, connectivity, walkability, the use of alternative transportation modes, and a closer link between housing and jobs.
  - Policy 4.3: Support the long-term maintenance, improvement, and conservation of existing neighborhoods, existing housing, and infrastructure through code enforcement, housing rehabilitation, and reinvestment strategies.
  - Policy 4.4: Work with property owners, tenants, and non-profit purchasers to protect the affordability of income-restricted housing for low- and moderate- income households.
  - Policy 4.5: Identify and preserve important examples of historic or architecturally significant residences.
  - Policy 4.6: Support strategies for the adaptive reuse of residential, commercial, industrial, and institutional structures to provide for a range of housing types.
  - Policy 4.7: Leverage State and federal loans and grants to assist in preserving existing housing and rehabilitating unsound housing structures and prioritize street and infrastructure improvement projects to benefit high-need areas, particularly in the Environmental Justice neighborhood.
  - Policy 4.8: Promote modifications to increase energy efficiency and the use of alternative energy sources such as solar energy, cogeneration, and non-fossil fuels.
  - Policy 4.9: Encourage energy conservation, water efficiency, and sustainable building measures in new and existing homes through adherence to the California Green Building Code.
- **GOAL 5: Affirmatively further equal and fair access to housing opportunities for all residents.**
  - Policy 5.1: Affirmatively further fair housing related to the sale, rental, and financing of housing to avoid discrimination based on race, religion, age, sex, marital status, ancestry, national origin, color, familial status, disability, or any other arbitrary factor.
  - Policy 5.2: Expand housing opportunities throughout the community for all persons, including but not limited to seniors, veterans, individuals with disabilities, and persons experiencing homelessness.
  - Policy 5.3: Assist in the enforcement of fair housing laws by providing support to organizations that can receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
  - Policy 5.4: Facilitate increased participation among traditionally underrepresented groups and Environmental Justice neighborhood residents in the public decision-making process.

- Policy 5.5: Provide outreach and education for the broader community of residents, residential property owners, and operators regarding fair housing practices and requirements.
- Policy 5.6: Work cooperatively with the San Gabriel Valley Council of Governments (SGVCOG) and other applicable agencies to provide a continuum of care for persons experiencing homelessness, including emergency shelter, transitional housing, supportive housing and permanent affordable housing.

In addition to goals and policies, the Housing Element includes a number of implementation action programs to implement the policy direction. Many programs are included to comply with new State laws. Some of the most significant programs include:

**PROGRAM 1.1: ADEQUATE SITES.** The City of Monrovia has a remaining RHNA of 982 units for the 2021-2029 RHNA planning period after credits for approved projects are applied to the full 1,670-unit RHNA. Overall, the City can adequately accommodate the City's current RHNA under existing General Plan and Zoning Code standards. The residential sites inventory addresses the current RHNA through accessory dwelling unit (ADU) projections, and non-vacant residential and mixed-use project sites. All combined, the sites inventory has a capacity to yield 1,313 units.

The City will maintain an inventory of available sites for residential development and will make it publicly available at the City planning counters and on the City's website. The City will continue to track the affordability of new housing projects and progress toward meeting the City's RHNA.

The City is not responsible for the actual construction of these units. The City can, however, create a regulatory environment that better enables the private market to build these units. This includes the adoption and implementation of General Plan policies, zoning and development standards, and/or incentives to encourage the construction of various types of units.

**PROGRAM 1.2: NO NET LOSS.** Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city or county must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

The City will evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, the City will identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

**PROGRAM 1.3: PLANNING HOME.** Fully implement the Planning Housing Opportunities for Monrovia (Planning HOME) program, the City's strategy to facilitate and streamline housing production in a holistic balanced Monrovia-centric approach. The City was awarded a \$160,000 Building Homes and Jobs Act (SB 2) grant and a \$150,000 Local Early Action Planning (LEAP) Grant that will be used to reimburse staff time dedicated to creating and implementing certain planning processes. The Grants provide partial funding but does not cover the full cost of implementation. The City will use the funding for the following:

- **Development Standards Amendments**
  - Remove Conditions Use Permit (CUP) requirement for multifamily developments
  - Update/amend small lot subdivision regulations; remove CUP requirement
  - Reduce minimum dwelling unit sizes (attached and detached)
  - Parking requirements review
  - Develop/provide affordable housing zoning incentives



- **Special Needs Housing Requirements Review**  
Update to reflect recent legislative changes (supportive-AB 2162, transitional)  
Supportive housing ordinance  
Amend Reasonable Accommodation Ordinance to remove discretionary review
- **Objective design standards/guidelines**  
Develop objective design standards/compatibility guidelines for all multifamily projects consisting with the HAA
- **Add Housing Capacity Through Zoning in “transit rich” areas**  
Facilitate development in Station Square (east) with LUE/PD-12 update  
Expand SSTV through the rezoning/adoption of Station Square West PD Area
- **Update General Plan and CEQA Guidelines to Facilitate Housing Development**  
Circulation Element LOS to VMT (SB 743)  
Review and update CEQA Guidelines for streamlining opportunities through clarified exemptions to reflect SB 35/SB 1515 (HAA)
- **Update 1970s Subdivision Ordinance**  
Adopt Lot Merger Ordinance
- **Accessory Dwelling Units**  
Update ADU Ordinance, remove CUP requirement for HFZ areas. Explore use in MFR zones. (SB1069)  
Develop and disseminate educational information on ADUs and Junior ADUs  
Create standard template for ADU processing  
Develop pre-approved ADU site/floor plans
- **Expand housing opportunities for Adaptive Reuse**  
Identify potential sites, adopt development standards, amend nonconforming ordinance to allow conversions, especially for buildings with historic value
- **Update Density Bonus Ordinance**
- **Explore inclusionary ordinance or inclusionary incentives**
- **Explore alternative housing types and adopt standards**  
Mini House/SRO/micro apartment/live-work regulations/SB 9 units.
- **Streamline Development Services process and expand one-stop counter**  
Implement a building self-inspection/certification program for simple, low-risk permits  
Expand plan check options; implement electronic plan review system  
Explore priority processing for specified project types (e.g. affordable)
- **Facilitate customer information/education**  
Maintain submittal checklists (ADU, plan check)
- **Improve internal processing capacity**  
Data collection/reporting on permit tracking metrics to identify processing problems  
Staff training on latest Building Codes  
Multi department Development Services coordination bi-monthly meetings

- **Develop specific plan template**
- **Increase online presence**
  - Create online Development Services handbook
  - Online fee calculator
  - ADA/Accessibility portal
  - Community/developer support
  - Sustainable Development and Green Programs – Create developer/resident education portal
  - Maintain current sites inventory online
- **Create online housing opportunity program portal/social media**
  - Develop home buyers program brochure/web info
  - Section 8 referral
- **Continue to facilitate housing opportunity workshops through MAP**
  - ADU, CDBG grants
- **Housing Displacement Response Plan**
- **Overhaul of Development Services Fee Schedule**
  - Flat rate building fee structure (simple, predictable, and fair)
  - Impact Fee program to exclude affordable/special needs housing
  - Fee reduction for affordable units (pro-rated)

**PROGRAM 1.4: LAND USE POLICY CHANGES.** Amend the Title 17-Zoning Code to:

- Require by-right approval of housing development that includes at least 20 percent of the units as housing affordable to lower-income households on the 800 S. Myrtle Avenue site because it is the only non-vacant site used in the previous Housing Element, pursuant to AB 1397. Housing developments that do not contain the requisite 20 percent would still be allowed to be developed according to the underlying zoning but would not be eligible for by-right processing; however, the jurisdiction would have to make findings on the approval of that project pursuant to No Net Loss Law.
- Include Low-Barrier Navigation Centers as a by-right use in areas zoned for mixed-use and nonresidential zones permitting multifamily uses, pursuant to AB 101. Low-Barrier Navigation Centers are housing or shelter with limited barriers to entry in which a resident who is homeless or at risk of homelessness may live temporarily while waiting to move into permanent housing.
- As part of the Planning HOME program, include supportive housing as a by-right use in zones where multifamily and mixed-uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development meets specified criteria, pursuant to AB 2162. Allow transitional and permanent supportive housing in all zones allowing residential uses, subject to the same permitting. This includes non-residential districts that allow residential uses, such as NC, HCD, and RCM.
- Identify SROs as a conditionally permitted use within certain commercial zones.
- Allow mobile and manufactured homes fixed to a foundation as permanent dwellings in all residential zoning districts where single-family dwellings are permitted by right.
- Clarify allowed uses and applicable standards in zoning districts allowing mixed-use.

**PROGRAM 1.5: STATION SQUARE TRANSIT VILLAGE.** The 80-acre Station Square Transit Village (SSTV) was established to guide development of high density residential and mixed-use development surrounding the Monrovia L (Gold)

Line Station. The Station Square Transit Village Planned Development Area 12 (PD-12) has been purposely designed to allow maximum flexibility in the intensity and location of development in response to market conditions. PD-12 allows a range of housing types, with a target range of 1,400 to 3,600 units within the Station Square Transit Village area, and no density cap on individual parcels. Units can be built as stand-alone products or as part of a horizontally or vertically integrated mixed-use development. To encourage more transit-oriented development in the Station Square area, Planned Development Area 27 (PD-27) known as “Station Square West” was adopted in 2020.

The City will continue to provide zoning and development standards to facilitate residential and mixed-use development within Station Square Transit Village, including incentives for the inclusion of affordable units. As part of the Planning HOME program, the City will facilitate development in Station Square (east) with the LUE/PD-12 update.

**PROGRAM 1.6: ACCESSORY DWELLING UNITS.** An ADU, attached or detached dwelling unit, provides complete, independent living facilities for one or more persons on the same parcel as the primary single-family dwelling. ADUs may be a key component to the City’s strategy to offer more affordable housing. ADUs offer several other benefits as well. ADUs typically rent for less than apartments of comparable size, and can offer affordable rental options for seniors, college students, and single persons. Also, the primary homeowner receives supplementary income by renting out their ADU, which can help many modest income and elderly homeowners remain in or afford their homes.

As part of the Planning HOME program, the City updated the ADU Ordinance in 2020, which removed the CUP requirements for ADUs in the HFZ areas and allowed ADUs in multifamily zones and is in the process of developing educational information on ADUs and creating a standard template for ADU processing and pre-approved ADU site/floor plans.

The City has updated its ADU ordinance and will provide updates as further legislation becomes effective.

**PROGRAM 1.7: INCLUSIONARY ORDINANCE.** As part of the Planning HOME program, explore adopting an inclusionary housing ordinance to increase the supply of affordable housing throughout Monrovia.

**PROGRAM 1.8: REPLACEMENT OF UNITS ON SITES.** Government Code Section 65583.2(g)(3) requires the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements shall be required for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity’s valid exercise of its police power; or
- Occupied by low or very low-income households.

For the purpose of this program “previous five years” is based on the date the application for development was submitted.

Pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), the City shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

The City will also incorporate a housing displacement/replacement program as part of any adopted inclusionary housing ordinance.

**PROGRAM 2.1: AFFORDABLE HOUSING DEVELOPMENT ASSISTANCE.** The City can play an important role in facilitating the provision of quality affordable and mixed-income housing in the community through the provision of development assistance.

The City will:

- As part of the Planning HOME program develop a toolkit of housing incentive programs to facilitate the construction of affordable and market rate housing products.
- Provide, when possible, developer incentives such as expedited permit processing and developer impact fee deferrals for affordable units.
- Continue to provide pre-application technical assistance to affordable housing providers to determine project feasibility and address zoning and code compliance issues in the most cost effective and expeditious manner possible.
- Encourage the provision of housing affordable to extremely low income (ELI - <30% AMI) households, by waiving 100 percent of Planning Department entitlement application processing fees for projects with a minimum ten percent ELI units, but not less than one unit.
- Continue to post up-to-date information about affordable housing incentives on the City's website.
- Continue to facilitate partnerships with developers of local affordable housing by offering letters of support for grant applications and advising on local zoning and code compliance.

**PROGRAM 2.2: CONGREGATIONAL LAND OVERLAY ZONE.** Consider allowing religious congregations to build affordable housing by establishing a Congregational Land Overlay Zone or through a text amendment to the Zoning Code.

**PROGRAM 2.3: SPECIAL NEEDS HOUSING.** Provide housing opportunities to accommodate special needs residents—including seniors, residents with disabilities and developmental disabilities, large families, extremely low-income households, and those experiencing homelessness— streamline the review of development projects that include a component for special needs groups in addition to other lower-income households.

Take incentives available to senior housing and expand them to all special needs housing types, including reduced parking standards and unit sizes, increased height allowances, and maximum lot coverage. Provide additional regulatory incentives and concessions to projects targeted for these special needs groups.

Provide regulatory incentives and concessions to projects targeted for persons with disabilities, including persons with developmental disabilities. Review the permit and processing procedure for group homes for 7+ clients to ensure that these uses are treated objectively and do not discriminate against persons with disabilities.

**PROGRAM 2.4: ADDRESS HOMELESSNESS.** Implement the City's Plan to Prevent and Combat Homelessness, which includes the following actions:

- Be persistent in our contact with anyone suffering from homelessness
- Expand Community Coordination in support of ending homelessness
- Promote the use of the San Gabriel Valley Coordinated Entry System (CES)
- Develop educational materials to promote health and safety
- Develop a Monrovia Centric Directed Giving program
- Develop a Housing Displacement Response Plan

In addition to the actions listed above, the City will:

- Continue its partnership with Mountainside Communion Church to implement a Housing Displacement Response Program. This program will work to reduce homelessness for Monrovia residents by providing a “hand-up” in support of current Monrovia residents who are in danger of displacement.

- Pursue additional funding to resume the Emergency COVID Housing Impact Program (eCHIP) to meet the immediate needs of Monrovia residents who have been devastated by the COVID-19 pandemic and will ultimately face homelessness if intervention is not provided immediately.
- Continue working with service providers and other non-profit organizations who aid residents experiencing homelessness and provide technical support as needed.
- Continue providing local service providers with the Homeless Response Kit: Resources to Prevent and End Homelessness.

**PROGRAM 2.5: SAN GABRIEL VALLEY REGIONAL HOUSING TRUST.** Since 2020, the City of Monrovia has been a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) which was created to bring additional affordable housing resources to address the growing homelessness crisis in the San Gabriel Valley. The SGVRHT funds the planning and construction of affordable housing for homeless housing and extremely low, very low, and low-income housing projects. The member cities of the SGVRHT are Alhambra, Arcadia, Azusa, Baldwin Park, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, La Verne, Monrovia, Pomona, South El Monte, South Pasadena, and West Covina.

In 2020 and 2021 combined, the City allocated \$329,490 of its Permanent Local Housing Allocation (PLHA) funds to the San Gabriel Valley Regional Housing Trust. The funds would be directed towards specific projects that will be selected by the SGVRHT and its Board of Directors. The projects must be in a member city and have member city support. Currently there are 18 projects on the pipeline, totaling over 1,000 units including 66 senior and permanent supportive housing units in Monrovia.

As funding permits, the City will continue coordination and participation in the SGVRHT program and will explore opportunities for development of SGVRHT-funded projects in Monrovia.

**PROGRAM 3.1: DEVELOPMENT PROCESS STREAMLINING.** As part of the Planning HOME program, the City will implement a building self-inspection/certification program for simple, low-risk permits, expand plan check options, implement an electronic plan review system, and explore priority processing for specified project types (e.g. affordable housing). The program will also include actions to facilitate customer information/education and improve internal processing capacity.

As of July 17, 2020, HCD determined that the City of Monrovia was subject to SB 35 streamlining for proposed developments having 50 percent or greater affordability. To accommodate future SB 35 applications and inquiries, the City will create and make available informational material that explains SB 35 streamlining provisions in Monrovia and provides SB 35 eligibility information. As part of the Planning HOME program, the City will develop objective design standards/compatibility guidelines for multifamily projects consistent with the streamlining provisions of the Housing Accountability Act.

**PROGRAM 3.2: NON-GOVERNMENTAL CONSTRAINTS.** Review non-governmental constraints, and if necessary, revise any development regulations or processes that can potentially lessen those constraints.

**PROGRAM 3.3: WATER AND SEWER SERVICE PROVIDERS.** To facilitate effective coordination between local planning and water and sewer service functions to ensure adequate water and sewer capacity is available to accommodate housing needs, submit the adopted Housing Element to all water and sewer service providers—including internal City departments—in accordance with Government Code Section 65589.7 Confirm that these providers have procedures in place to grant priority for the provision of water and sewer services to proposed developments that include units affordable to lower-income households as required by law.

**PROGRAM 4.1: CARE FOR YOUR NEIGHBOR – NEIGHBORHOOD IMPROVEMENT GRANTS.** The Care for your Neighbor Program is a comprehensive approach to preserving existing housing stock, combating blight and crime, and empowering neighborhoods by fostering citizen activism, volunteerism and community pride. The Program helps low-income, elderly, or disabled homeowners bring their properties into compliance. The City will seek to achieve three projects annually, for a total of 24 projects during the planning period and will advertise the availability of the Neighborhood Improvement Grants on the City's website, and through flyers available at City Hall.

**PROGRAM 4.2: MONROVIA AREA PARTNERSHIP (MAP).** The Monrovia Area Partnership Program provides annual neighborhood conferences and quarterly leadership academy events. The program provides education, tools and resources, information, and motivation for residents to become involved in the community. The City will continue to provide ongoing residential rehabilitation assistance to property owners through an updated MAP resources publication. The Residential Rehabilitation Grant Program will be advertised through MAP's Resources Guide. MAP conference topics include housing rights, and home buyer purchasing and maintenance, among others.

**PROGRAM 4.3: CDBG RESIDENTIAL REHABILITATION GRANTS.** The Community Development Block Grants (CDBG) Residential Rehabilitation Home Improvement Grant program provides grants (maximum of \$12,500) to qualified low- to moderate-income homeowners of single-family detached homes to ensure decent, safe, and sanitary housing for Monrovia; to correct hazardous conditions; to make improvements that eliminate blight and improve handicapped access; and to correct building and health code violations. Due to limited funding, the City is constrained in the number of Residential Rehabilitation Grants it can provide but will continue to offer the program if CDBG funds are available.

**PROGRAM 4.4: MAKE A DIFFERENCE DAY.** Make a Difference Day provides opportunities for community building and builds local volunteerism. The Volunteer Center and City of Monrovia assist low-income households with home repairs and maintenance by coordinating volunteers who provide free labor and donated materials. Historically, three-fourths of projects (75 percent) take place on residential properties, including landscaping, minor repairs, and installations (i.e., door/window replacements, ADA ramp installation, new carpet etc.), and interior and exterior painting.

The City will identify qualifying residential properties to serve as project locations through the Neighborhood Services Division of the Community Development Department and will continue to coordinate with the Volunteer Center to sponsor Make a Difference Day annually in October throughout the 2021-2029 Housing Element period.

**PROGRAM 4.5: HISTORIC LANDMARK/MILLS ACT CONTRACTS.** To preserve historic homes, the City of Monrovia assists homeowners in designating historic properties as local landmarks and preparing Mills Act Contracts. A Mills Act Contract allows the homeowners of historic properties to receive a property tax reduction. The homeowners use the tax break to invest the savings towards the restoration and preservation of the home. The City will also continue to collaborate with other Historic Preservation entities including Monrovia's Historic Preservation Group (MOHPG) and the City's Historic Preservation Commission.

**PROGRAM 4.6: ADAPTIVE REUSE.** Adaptive reuse can serve as a tool to expand housing opportunities while also supporting other key objectives of the City, such as historic preservation. As a housing strategy, adaptive reuse can introduce housing into non-residential areas, restore buildings to a useful purpose, and provide live/work space at a reasonable cost. Monrovia encourages the adaptive reuse of historic structures, allowing uses not otherwise allowed through the base zone as well as allowing for increased residential densities. As part of the Planning HOME program, the City will identify potential sites, adopt development standards, and amend the Nonconforming Uses and Structures ordinance to allow conversions, especially for buildings with historic value.

**PROGRAM 4.7: CODE ENFORCEMENT/NEIGHBORHOOD PRESERVATION.** The City will continue to use code enforcement to support housing preservation and neighborhood quality and identify housing maintenance issues. Monrovia's code enforcement program focuses on bringing substandard housing units into compliance with City codes, removing or rehabilitating units that pose threats to the health and safety of its residents, and preventing the deterioration of the City's housing stock. The program provides for systematic inspections. Additionally, the program takes a holistic approach to code enforcement by focusing not only on problems with individual properties, but also looks at neighborhoods and the community. The Code Enforcement Services Section works closely with the Building and Planning Divisions to provide a multi-disciplinary approach to solving problems. The Program's targeted areas of concentrated rehabilitation needs (including the Environmental Justice community) results in home repairs, and mitigates potential cost, displacement, and relocation impacts on residents. Property owners with compliance needs can refer to the City's programs for rehabilitation assistance.

In addition, the City will provide ongoing rehabilitation assistance to property owners through its updated MAP resources handout, online flyers, and financial assistance through the Care for your Neighbor Program and CDBG Rehabilitation grants for property owners with financial or disability needs.

**PROGRAM 4.8: ENERGY CONSERVATION.** The City will:

- Support the incorporation of sustainable practices in the construction, rehabilitation, and maintenance of housing in the community.
- Continue to encourage energy-efficient design and energy conservation, and help residents minimize energy-related expenses. Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects.
- Provide information on available home loan programs (such as Benji) and encourage residents to use the programs to implement energy efficient design.
- Encourage and explore additional funding opportunities for energy conservation devices, including but not limited to lighting, water heater treatments, and solar energy systems in all residential projects.
- Review ordinances and recommend changes where necessary to encourage energy-efficient housing design and practices that are consistent with State regulations and advances in technology. Continue to enforce the State energy standards of the California Green Building Code.
- Ensure compliance with AB2188 by adopting a solar ordinance including a streamlined permitting process.

**PROGRAM 4.9: MONITOR AND PRESERVE AFFORDABLE HOUSING AND AT-RISK UNITS.** The California Housing Partnership data shows that 29 affordable units in the City are at-risk of conversion to market rate housing. These housing units are located at 724 S. Monterey Avenue (Mayflower Arms, 28 units) and 525 East Walnut (Subsidized Housing Corporation 25, 1 unit). The Baldwin Park Housing Authority manages the City's Section 8 housing program and will contact the City if any units in Monrovia are lost.

City staff will be prepared to provide technical assistance to owners, tenants, and non-profit housing corporation buyers of existing subsidized low-income housing complexes to extend subsidy contracts and/or find government financing for acquisition of affordable rental units. If conversion of a subsidized complex or other affordable housing to market rate becomes likely, the City will work with tenants of at-risk units and provide them with education regarding tenant rights, first right of refusal, and conversion procedures. The City will also provide tenants information regarding Housing Choice Voucher (Section 8) rent subsidies through the Baldwin Park Housing Authority and other affordable housing opportunities.

**PROGRAM 4.10: HOUSING CHOICE VOUCHERS (SECTION 8).** The City will continue its partnership with the Baldwin Park Housing Authority to administer the Housing Choice Voucher (Section 8) rental assistance program and will support additional Housing Choice Vouchers in the community and encourage rental property owners to rent to Housing Choice Voucher holders.

**PROGRAM 5.1: AFFIRMATIVELY FURTHERING FAIR HOUSING.** The City promotes and affirmatively furthers fair housing opportunities and promotes housing for all persons, including those protected by the California Fair Employment and Housing Act and any other State or federal fair housing and planning laws. Chapter 3 summarizes the fair housing issues and concerns in Monrovia based on research conducted as part of this Housing Element update and supplemented by data from the state's Department of Housing and Community Development AFFH Data Viewer. Program 5.1 includes the following summary of the issues, contributing factors, and the City's actions in addressing these issues.

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Meaningful Actions
Concentration of Minority and Lower Income Residents (Priority: Medium)	<ol style="list-style-type: none"> <li>1. Location and type of housing (affordable, rental)</li> <li>2. High cost of land</li> <li>3. Historical lending discrimination</li> <li>4. Historical development patterns (freeway)</li> </ol>	Disproportion need, concentration of lower income households and minority populations, and displacement risks are interconnected. As such, the meaningful action items address a variety of issues.
Displacement risk due to regional economic pressure (Priority: Medium)	<ol style="list-style-type: none"> <li>1. Inadequate supply/production of affordable/special needs housing</li> <li>2. Displacement of residents due to regional economic pressures</li> <li>3. High land and development costs in the region</li> <li>4. Land use and zoning laws</li> <li>5.</li> </ol>	<p><b>Program Actions:</b></p> <ul style="list-style-type: none"> <li>• Expand access to multilingual informational material on fair housing to be made available at public counters, libraries, post office, other community locations, and on the City’s website within 2 years (December 2023).</li> <li>• Continue to participate in and implement the Analysis of Impediments to Fair Housing Choice for Los Angeles County. Assess fair housing issues as part of the regional Analysis of Impediments to Fair Housing Choice (estimated to be updated in 2025) and address identified impediments in Monrovia within one year after AI is published.</li> </ul>
Disproportionate housing needs in areas with lower incomes and higher proportions of renters (Priority: High)	<ol style="list-style-type: none"> <li>1. Inadequate supply/production of affordable/special needs housing</li> <li>2. High land and development costs in the region</li> <li>3. Land use and zoning laws</li> <li>4. Historical development patterns (freeway)</li> <li>5. Location of environmental health hazards</li> </ol>	<ul style="list-style-type: none"> <li>• Promote public awareness of federal, State, and local regulations regarding equal access to housing. Provide information to the public on various state and federal housing programs and fair housing law. Maintain referral information on the City’s website and at a variety of other locations such as community and senior centers, local social service offices, in City utility bills, and at other public locations including City Hall and the library (underway and ongoing).</li> <li>• Continue to contract with and refer fair housing complaints to the Housing Rights Center (HRC), whose services include counseling and mediation between tenants and landlords, fair housing trainings, workshops, and outreach. Facilitate public education and outreach by creating multilingual informational material on fair housing that will be</li> </ul>



		<p>made available at public counters, libraries, post office, other community locations, and on the City’s website (underway and ongoing; annual CDBG allocation from the Los Angeles Urban County CDBG program).</p> <ul style="list-style-type: none"> <li>• Adopt and implement a General Plan Environmental Justice Element (December 2022)</li> <li>• Develop an equity-focused Community Outreach Plan that outlines strategies and best practices for facilitating community participation and incorporating community input into the decision-making process. Be aware of, and take measures to address, cultural considerations that may impact a person’s involvement in the public realm (adoption and implementation of the General Plan Environmental Justice Element (Program 5.1.1), December 2022).</li> <li>• Continue to utilize a variety of communication techniques and social media tools to convey information to the public and ensure information is available in multiple languages, as needed (adoption and implementation of the General Plan Environmental Justice Element (Program 5.1.1), December 2022).</li> <li>• Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application’s compliance with all entitlement requirements (underway and ongoing).</li> <li>• Continue to educate the public about the reasonable accommodation procedure through the City’s website and at the Community Development Department counter (underway and ongoing).</li> <li>• Conduct public meetings at suitable times, accessible to Environmental Justice community’s residents,</li> </ul>
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		<p>persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings (underway and ongoing).</p> <ul style="list-style-type: none"> <li>• Actively recruit residents from underserved neighborhoods, including the Environmental Justice community, to participate on committees to address affordable housing needs and homelessness (underway and ongoing).</li> </ul> <p>Many related program actions are included in other programs in this Housing Plan:</p> <ul style="list-style-type: none"> <li>• Housing mobility:             <ul style="list-style-type: none"> <li>○ Program 4.10: Housing Choice Vouchers (Section 8)</li> </ul> </li> <li>• Develop multifamily and affordable housing opportunities:             <ul style="list-style-type: none"> <li>○ Program 1.3: Planning Home</li> <li>○ Program 1.6: Accessory Dwelling Units</li> <li>○ Program 2.1: Affordable Housing Development Assistance</li> <li>○ Program 2.2: Congregational Land Overlay Zone</li> <li>○ Program 2.3: Special Needs Housing</li> <li>○ Program 2.5: San Gabriel Valley Regional Housing Trust</li> </ul> </li> <li>• Address Displacement             <ul style="list-style-type: none"> <li>○ Program 1.8: Replacement Of Units On Sites</li> <li>○ Program 4.1: care for your neighbor – neighborhood improvement grants</li> <li>○ Program 4.10: Housing Choice Vouchers (Section 8)</li> </ul> </li> <li>• Address constraints to housing development:             <ul style="list-style-type: none"> <li>○ Program 1.3: Planning Home</li> <li>○ Program 1.4: Land Use Policy Changes (expand opportunities for special needs housing (AB101/AB 2162))</li> <li>○ Program 4.3: CDBG Residential Rehabilitation Grants</li> </ul> </li> <li>• Inclusionary requirements to</li> </ul>
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		<p>increase the supply of affordable housing</p> <ul style="list-style-type: none"><li>o Program 1.7: Inclusionary Ordinance</li></ul> <p>Details and timeframe for implementation can be found under each program.</p>
<p>* State law requires that prioritization of contributing factors giving highest priority to those factors that most affect fair housing choice or access to opportunity in Monrovia. The three identified fair housing issues are closely but disproportionate need points to more acute needs to address environmental conditions and housing cost issues and as such, is prioritized as High.</p>		

### **SAFETY ELEMENT UPDATE**

The Safety Element is a State-mandated element of the General Plan. The purpose of the update to the Safety Element is to comply with recent State legislation and guidelines (including Assembly Bill 162, Senate Bill 1241, Senate Bill 99, Assembly Bill 747, Senate Bill 1035 and Senate Bill 379). Technical amendments to the Safety Element are intended to achieve compliance with State, regional and local policies, and guidelines. The technical amendments incorporate data and maps, address vulnerability to climate change and wildfire. The Safety Element includes the following goals and policies. Additional specific actions are included in the Element to implement these goals and policies.

**Goal 1:** Reduce to a minimum the loss of life, disruption of goods and services and destruction of property associated with an earthquake

- Objective 1.1: Take potential fault areas into account in the General Plan.
  - Policy 1.1.1: No structures for human occupancy are permitted on or across the trace of the Raymond Hill Fault. Prior to approval of development of properties within the Alquist-Priolo Geologic Studies Zone, as delineated by the California Division of Mines and Geology, an applicant shall submit a report of the geologic investigation of potential faults that may affect structures proposed at the site. The Report shall be required for parcel maps, tract maps, development on residential lots, and residential additions adding floor area for human occupancy, and shall be prepared by a Registered Geotechnical Engineer registered with the State of California.
  - Policy 1.1.2: Properties located within known or potential fault areas shall be required to submit a geotechnical report at the time of submittal of the parcel or tract map, or for development on residential lots with single family dwellings, or additions to dwellings that add floor area for human occupancy (see policy 1.1.4). The report shall analyze the surface and subsurface geology of the site, the degree of seismic hazard and shall include conclusions and recommendations regarding the effect of geologic conditions on the proposed development, opinions and recommended criteria to mitigate any identified geologic hazards. This investigation and report shall be performed by a professional geotechnical engineer experienced in the practice of engineering geology and registered with the State of California.
  - Policy 1.1.3: Modifications to the setback limits specified by the Alquist-Priolo Act may be permitted at the discretion of the City, if such modifications also comply with the Municipal Code, based on a geotechnical report prepared by an independent licensed geotechnical engineer and/or geologist, mutually agreed upon between the City and developer and paid for by the developer. The geotechnical report shall be reviewed and subject to the approval of the City Engineer or his designee and shall be maintained on file by the City. The recommendations made in the geotechnical report may be approved, modified or denied by the City. Setback modifications may be permitted only if the developer and/or owner executes and records a restrictive covenant, in a form acceptable to the City Attorney, against the title to the property.

Such a restrictive covenant shall specifically define and require compliance with the permitted setbacks on the property and any applicable conditions required by the geotechnical report. Such restrictive covenant shall run with the land, be binding on successors in interest, acknowledge that the applicable setbacks have been modified at the request of the property owner in reliance on a geotechnical study, and further require that the property owner hold harmless, indemnify and defend the City, its officers, agents and employees from and against any liability or damage in any way arising out of the construction, maintenance and use of residential structures on the property.
  - Policy 1.1.4: Geotechnical reports submitted in response to the standards above shall be reviewed for adequacy by a Registered Geotechnical Engineer, and a report of that review submitted to the appropriate agency of the City. All costs for the preparation of these required reports are to be borne by the developer/applicant.

- Policy 1.1.5: A geotechnical report, prepared by a geologist registered with the state, shall be provided for all projects listed below located within an Alquist-Priolo Special Studies Zone:
  1. All new buildings for human occupancy. This shall include single family dwellings, guest houses and rental units.
  2. Additions to buildings discussed in Item 1 above when the area of the addition will exceed 50% of the area of the existing building.
  3. Any conversion from a building not used for human occupancy into one which is. (Authority: Section 3603(c), Title 14, CCR.)

No report shall be required for accessory buildings such as garages, tool sheds, swimming pool dressing rooms, etc. since these buildings are not normally used for human occupancy more than 2,000 person-hours per year.

- Objective 1.2: Implement programs to deal with hazardous areas or buildings.
  - Policy 1.2.1: Advocate and support state legislation that would require existing vital facilities to be brought into compliance with modern seismic design and construction standards.
  - Policy 1.2.2: Support legislation that provides for income tax incentives to encourage the repair of potentially hazardous buildings.
- Objective 1.3: The City shall require that all development take appropriate measures to protect public health and safety.
  - Policy 1.3.1: Continue to adopt and implement the most recent uniform building code (with special attention to Chapter 23 and Chapter 70), and all supplements which include the latest most stringent earthquake regulations for new construction.
  - Policy 1.3.2: If an EIR, or if detailed geologic investigation confirms existence of seismic hazards, the City shall require special earthquake resistant design features or use limitations, as appropriate, to protect the public health and safety and to reduce the exposure of individuals and property to seismic risks.

**Goal 2:** Minimize flooding hazards in the City of Monrovia.

- Policy 2.1.1: Design new development to incorporate flood control measures.
- Policy 2.1.2: Monitor and adopt appropriate flood management programs.
- Policy 2.1.3: Design flood control infrastructure to accommodate existing and anticipated storm flows associated with changing climatic conditions.
- Policy 2.1.4: Coordinate with appropriate agencies to identify and construct needed local and regional flood control improvements to address areas of concern.
  - Action 2.1.1.1: Implement the following development standards as flood control and landslide protection measures:
    - Graded slopes, other than those constructed in rock, shall be planted or otherwise protected from the effects of storm runoff erosion and shall be benched or terraced as required to provide for adequate drainage. Planting shall be designed to blend with the surrounding terrain and development. Graded slopes in rock shall be provided with soil pockets to contain landscaping where appropriate. Irrigation facilities shall be provided where necessary for proper establishment and maintenance of the planted areas.
    - Provision shall be made to prevent surface waters from eroding natural and graded slopes.

- Within six months, or such other period established by the Director of Public Works, after the commencement of grading activities, graded areas shall be stabilized as approved by the City Engineer. Slope planting shall not lag grading completion by more than six months.
- Grading on building sites shall not occur until specific site plans and elevations have been approved for the individual site except where, as part of a subdivision grading and public improvements, approved after a public hearing, the grading of a lot has been determined necessary for public safety (and is done in accordance with the intent and purpose of these policies.)
- Graded slopes over three feet in vertical height and all graded slopes to be maintained by a Landscape Maintenance District, or other City approved maintenance agreement, shall be planted to protect against erosion. Planting shall be in the ratio of at least one tree per three hundred square feet of slope and one shrub per one hundred fifty square feet, with ground cover sufficient to cover the bank within one year from planting.
- For all projects that require grading, a soils engineering report shall be required to include data regarding the nature, distribution and strengths of existing soils, conclusion and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading. This investigation and report shall be performed by a professional soil engineer experienced in the practice of soil mechanics and registered with the State of California.
- For lots greater than 7,500 square feet, a hydrology report shall be submitted at the time a grading plan is submitted to the City. The hydrology report shall identify areas of possible inundation, downstream effects, natural drainage courses, conclusions, and recommendations regarding the effects of hydrologic conditions on the proposed development, opinions and recommendations regarding the adequacy of facilities proposed for the site, and design criteria to mitigate identified hydrologic hazards. This report shall account for runoff and debris from tributary areas and shall provide consideration for each lot or dwelling unit site in a development. Runoff and debris volumes shall be computed using Los Angeles County Flood Control District criteria. This investigation and report shall be prepared by a registered civil engineer experienced in hydrologic investigation.
- Covenants, Conditions and Restrictions (CC&R's), including but not limited to development plans, common area and slope maintenance, private area landscaping and maintenance, shall be submitted and approved prior to the recordation of a final tract map.
- Hillside development shall provide all necessary sewers, storm drains, debris basins and other flood control measures as specified in specific plans.
- Action 2.1.1.2: Periodically update dam inundation maps and consider the proximity of dams in the site selection of vital public facilities.
- Action 2.1.1.3: Coordinate with the Los Angeles County Department of Public Works, the owner of all three dams, to develop Emergency Action Plans as required by State law.
- Action 2.1.1.4: The City Engineer will monitor the Cobey-Alquist Flood Plain Management Act for application in Monrovia.
- Action 2.1.1.5: Prepare an assessment of capacity needs of flood control and storm drainage infrastructure resulting from extreme weather caused by climate change.

**Goal 3:** Reduce the risk of fire and minimize consequences from fire events in Monrovia.

#### **Planning and Design**

- Policy 3.1.1: Continue to plan for new construction and redevelopment that decreases the likelihood of fire and decreases tie impacts of fire damage.
  - Action 3.1.1.1: Require development to provide adequate defensible space to minimize the risk of structural damage associated with wildland fires.

- Action 3.1.1.2: Require new development to be located in areas with adequate water supply and water supply infrastructure.
- Action 3.1.1.3: Continue to implement the California Building and California Fire Codes, as well as the following policies and standards for hillside development:
  - Fire suppression access to natural chaparral areas shall be provided and maintained.
  - Landscape materials for the coverage and stabilization of graded slopes shall be selected to be compatible with surrounding natural vegetation and shall recognize climatic, soil, exposure, and ecological characteristics of the site. Plant materials that require substantial water after becoming established shall be avoided. Native dry climate grasses and other materials shall be selected wherever feasible. (Fire Department approval required).
  - Cantilevered construction, including stairs, balconies, porches, open structure under buildings shall be fire retardant construction and shall be protected by fire sprinklers, when applicable, which have been reviewed and approved by the Fire Department.
  - Eaves shall be fully boxed in with exterior stucco or its equivalent. Vents shall be covered with one-sixteenth inch mesh or its equivalent.
  - New roofs shall be class "All non-flammable materials."
  - Flammable chaparral, excluding mature trees, on a lot within 200 feet of a home, shall be cleared, maintained, and replaced with vegetation to minimize fire hazard.
  - Fire hydrants shall be provided and located within 300 feet of structures except where a greater distance is allowed by the Fire Chief in conjunction with the installation of automatic fire sprinklers. All water main installations will be "looped" with no dead-end main allowed.
  - To provide adequate Fire Department access, foothill neighborhoods shall be linked with a continuous circulation system. Segments of that system may consist of emergency access roads.
- Action 3.1.1.4: Continue to enforce the following ordinances promoting fire prevention.
  - Enforce installation of fire alarm systems and or sprinklers to provide protection to life and property.
  - Enforce regulations requiring smoke detectors in all structures.
  - Enforce installation of chimney spark arrestors.
  - Prohibit the use of flammable roofing materials.
  - Continue to adopt, implement, and require new structures to incorporate latest California Building Code, California Fire Code (including a minimum of 40-foot right-of-way and a grade less than six percent to ensure adequate access for fire emergencies), Government Code sections 51175 and 51189 related to VHFSZ, and Board of Forestry and Fire Protection Fire Safe Regulations, among others.
  - To prevent life hazard and to protect the hillsides and residential, industrial, and commercial areas, enforce ban on use of all fireworks.

- Action 3.1.1.5: Control hazardous or potentially dangerous operations or land uses.
  - Require a conditional use permit for industrial operations involving the compounding of radioactive materials, petroleum refining, manufacturing of explosives, or any other operation of a dangerous nature.
  - Enforce ordinances prohibiting the igniting or burning of flammable materials on public or private property.
  - Restrict and regulate devices or equipment that could create fire, explosion, or bodily injury.
  - Restrict storage of flammable liquids and explosives to manufacturing zones.
- Action 3.1.1.6: Update zoning and/or building code to require residential and nonresidential structures have street numbers (and street name, as appropriate) visible from public and private roadways and alleys.
- Action 3.1.1.7: Identify all development that does not comply with current fire safety standards, in terms of road standards and vegetative hazard; establish and implement a mitigation plan to remedy the noncompliance.
- Action 3.1.1.8: Consider relocating and work with other agencies to facilitate the relocation of essential public facilities out of the high-risk, wildfire prone areas.
- Action 3.1.1.9: Avoid, if possible, or minimize new residential development in the VHFSZ.
- Action 3.1.1.10: Ensure that infrastructure located within VHFSZ has the capacity to support emergency services and operations.
- Action 3.1.1.11: Require all new essential public facilities be sited outside of the VHFSZ, when feasible.
- Action 3.1.1.12: Require new development within the VHFSZ provide a pre-plan, which includes:
  - location and direction of evacuation routes,
  - at least two points of ingress and egress,
  - maintenance of defensible space clearances around structures and subdivisions,
  - provision and maintenance of fuel breaks, and
  - provision and maintenance of roadside fuel reduction plan to prevent fires along public roads, and
  - a fire resistive vegetation landscape plan
- Action 3.1.1.13: Require all new and redevelopment occurring within the VHFSZ be designed, constructed, and maintained in accordance with the latest building and fire codes.
- Action 3.1.1.14: Ensure new and existing development located within the Very High Fire Severity Zone (VHFSZ) is designed to implement fire prevention measures.
- Action 3.1.1.15: Develop outreach programs that educate residents regarding:
  - evacuation routes and wildfire evacuations,
  - defensible space,
  - fire hazard impacts, such as structural damage, wildfire smoke, etc.,
  - fire prevention measures, and
  - structural hardening.



### **Redevelopment (Rebuilding) Policy**

- Policy 3.1.2: Continue to allow structures and infrastructures located in the VHFSZ to be rebuilt or redeveloped, after a large fire, in accordance with the Building and Fire Codes in place at the time of the rebuilding.
  - Action 3.1.2.1 Periodically, consider amending the City's VHFSZ Rebuilding policy to ensure it reflects community vision and best practices.

### **Water Supply**

- Policy 3.1.3: Ensure Monrovia's water supply and distribution system is adequate and appropriate to facilitate fire suppression.
  - Action 3.1.3.1: Develop and implement a plan to ensure the maintenance and long-term integrity of water supply and its supply infrastructure.
  - Action 3.1.3.2: Regularly assess the water supply systems for development are adequate to combat structural and wildland fires.
  - Action 3.1.3.3: Ensure or install fire protection water systems for all new construction projects in the VHFSZ, including the installation of fire hydrants providing adequate water flow, fire sprinklers or suppression systems.

### **Evacuation Plans and Roadway Capacity**

- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City's Evacuation Plan to identify the evacuation routes' capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
  - Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
  - Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.

### **Fuel Modification**

- Policy 3.1.5: Continue to support and implement fuel management programs.
  - Action 3.1.5.1: Maintain or require the maintenance of fire hazard reduction projects, including but not limited to community fire breaks, private road clearance, and public road clearance.
  - Action 3.1.5.2: Regularly assess the effectiveness, and modify as appropriate, the City's SAFE Landscaping materials and Community Wildfire Protection Plan.

### **Fire Protection Plans**

- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.

- Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
- Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
- Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
- Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
- Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

### **Climate Adaptation**

**Goal 4:** Ensure that Monrovia is adaptive in response to changing climate conditions.

- Policy 4.1.1: Incorporate climate resiliency principles into relevant planning and development policies and practices.
- Policy 4.1.2: Ensure that emergency response services maintain adequate capacity to respond to hazard events associated with climate change (wildfires, landslides, heatwaves, etc.)
- Policy 4.1.3: Design future utility and infrastructure improvements in the city to respond and withstand climate change impacts.
- Policy 4.1.4: Promote education and outreach to residents and businesses regarding the effects of climate change on the economy, environment, infrastructure, and special populations (elderly, homeless, immune-compromised, etc.)
  - Action 4.1.1.1: Update relevant city policies as necessary to include climate adaption strategies, such as building codes, development standards, safety response etc.
  - Action 4.1.1.2: Track and monitor first responder calls to hazard events associated with wildfires, extreme wind events, flooding, and mudslides to identify increasing trends related to changing climatic conditions.
  - Action 4.1.1.3: Continue to work in close collaboration with water and energy providers in identifying and implementing demand management strategies.
  - Action 4.1.1.4: Develop a heat response plan to set up systems to predict and communicate with the public about heat events, coordinate response, and designate cooling centers.
  - Action 4.1.1.5: Upgrade city facilities used as cooling centers, evacuation centers, and other emergency facilities to accommodate changing future needs and conditions.
  - Action 4.1.1.6: Coordinate with public health departments on the increased risk to community health from reduced air quality, higher temperatures, reduction in mental and physical well-being, and an increase in occurrence and spread of infectious disease.

- Action 4.1.1.7: Coordinate and support property owners in implementing various climate adaptation measures in their homes or businesses, such as installation of energy efficient appliances, air filtration systems, water capture infrastructure, etc.

## **Emergency Preparedness**

**Goal 5:** Maximize the efficiency of City's Disaster Program.

- Objective 5.1: Maximize the efficiency of City's Emergency Management Operations System
  - Policy 5.1.1: Conduct required Emergency Operation Center exercises to keep skills current.
  - Policy 5.1.2: Sponsor earthquake disaster drills at public schools including a community awareness program outlining a procedure where students would be reunited with their parents, after the disaster.
  - Policy 5.1.3: Require preparation of internal emergency response plans for medium and high-rise buildings.
  - Policy 5.1.4: Enact an ordinance requiring the preparation of internal emergency response plan for all facilities housing dependent population such as elderly.
  - Policy 5.1.5: Promote expansion of disaster recovery program to include assurance of maximum citizen awareness.
- Objective 5.2: Enact Ordinances to Aid in Prevention of Disasters.
  - Policy 5.2.1: In hillside areas, home sites must be planned, designed, and developed to provide maximum safety with respect to fire, earthquake faults, geology, drainage, erosion, and siltation hazards.
  - Policy 5.2.2: Give primary emphasis to the alleviation of the most critical hazards affecting existing populations and development.
  - Policy 5.2.3: Give greater emphasis to abatement strategies for dealing with critical hazards.
  - Policy 5.2.4: Employ incentives to encourage private actions aimed at reducing safety hazards.
- Objective 5.3: Enact Ordinance to Aide in Evacuation of /or Access to Areas of Disasters.
  - Policy 5.3.1: Designate evacuation routes for all areas of the City.
  - Policy 5.3.2: In hillside areas, no cul-de-sac street shall have a length exceeding one thousand feet unless provided with an emergency access connector.
  - Policy 5.3.3: Hillside streets shall have minimum widths as specified in hillside development policies and standards.

## **ENVIRONMENTAL JUSTICE ELEMENT**

The City is developing a new Environmental Justice Element to be part of the General Plan and reflect the City's efforts in addressing Environmental Justice. The State of California defines Environmental Justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies" (California Government Code §65040.12(e)).

In 2016, the State of California passed Senate Bill 1000 (SB 1000) requiring cities and counties to address Environmental Justice in their general plans. The City has elected to prepare a separate Element rather than integrating Environmental Justice policies among existing General Plan elements. As provided by State Government Code 65302(h), the Environmental Justice Element has the same weight as the mandatory elements of the General Plan and is internally consistent with the other elements. The purpose of the Environmental Justice Element is to address public health risks and environmental justice concerns of those living in disadvantaged communities as defined in Gov. Code, §65302(h)(4)(A), many of which are the result of geographic or procedural inequities.

Consistent with requirements of SB 1000, the City proposes a new Environmental Justice Element that identifies disadvantaged communities, also known as Environmental Justice Communities, within the City's General Plan planning area and establishes goals, policies, and programs to reduce unique or compounded health risks in Environmental Justice Communities through efforts including:

- Reducing pollution exposure and improving air quality,
- Promotion of public facilities,
- Promotion of food access,
- Promotion of safe and sanitary homes,
- Promotion of physical activity, and
- Civic engagement in the public decision-making process.

The Environmental Justice Element includes the following goals, objectives, policies and programs:

**Goal 1:** Ensure that all residents have fair and equal access to affordable housing options.

- Policy 1.1: Promote and affirmatively further fair housing policies and programs.
  - Program 1.1.1: Continue to implement the local housing policies and programs in the Housing Element and periodically review to ensure they support and do not pose impediments to furthering fair housing.
  - Program 1.1.2: Continue to partner with housing rights organizations to disseminate information on landlord responsibilities and tenant rights in a manner that is culturally sensitive and easily accessible.
- Policy 1.2: Expand affordable housing along transit corridors.
  - Program 1.2.1: Consider exploring best practices for innovative housing options such as tiny homes, cooperatives, community land trusts, etc. that prioritize community ownership and support resident efforts to build intergenerational wealth.
  - Program 1.2.2: Maintain and update information on the City website dashboard that contains resources related to affordable housing, rental assistance, tenant rights, homeownership, homelessness services, and other special needs resources.
  - Program 1.2.3: Implement and enhance Housing Element goals related to anti-displacement policies to ensure that future improvements in the environmental justice community do not result in a net loss of affordable housing or displacement of existing residents.
- Policy 1.3: Support and adopt policies to encourage the development of supportive housing to accommodate seniors and persons with disabilities.
  - Program 1.3.1: Expand use of senior housing incentives to all special needs housing types, including reduced parking standards and unit sizes, increased height allowances, and maximum lot coverage. Provide additional regulatory incentives and concessions to projects targeted for these special needs groups.
  - Program 1.3.2: Provide regulatory incentives and concessions to projects targeted for persons with disabilities, including persons with developmental disabilities. Review the permit and processing procedures for group homes for 7+ clients to ensure that these uses are treated objectively and do not discriminate against persons with disabilities.

**Goal 2:** Ensure residents of all ages have access to a range of safe and accessible opportunities for recreation and physical activities.

- Policy 2.1: Encourage the use of park spaces for community events and activities, hosted by local city businesses and organizations.
  - Program 2.1.1: Continue to offer and promote Monrovia's "Populate the Park" program.

- Program 2.1.2: Continue to provide and promote City sponsored recreation (physical or art classes) and educational activities (example, book mobile or reading kiosks) at urban public spaces such as the L Line station, the public plazas in the Station Square Transit Village residential neighborhoods, etc.
- Policy 2.2: Continue to enhance a park system that provides all residents with access to parks, community centers, sports fields, trails, urban open space, and other amenities.
  - Program 2.2.1: Continue to implement the community needs identified in the Park Master Plan (PMP) and the Open Space Element. Explore opportunity areas for small parks or open spaces in areas that have been identified as “park poor” in the PMP and target areas in Environmental Justice neighborhoods and south of the Foothill Freeway.
  - Program 2.2.2: Continue to require multifamily residential development to provide active private open space for residents and their guests to offset the demands on neighborhood parks.
  - Program 2.2.3: Continue to encourage the establishment of urban open space and recreation opportunities such as plazas and public community gathering spaces provided by both non-residential and residential development.
  - Program 2.2.4: Continue to establish shared use agreements with schools, private properties with large open spaces, and religious institutions as a method for increasing access to recreational facilities and community gathering facilities, particularly in park poor areas.
  - Program 2.2.5: Improve Lucinda Garcia Park to include new walking paths/surfaces, fitness and playground equipment, updated signage, and improved lighting.
  - Program 2.2.6: Assess local parks and sidewalks (including ramps) to assess if physical barriers occur that would block or inhibit people with disabilities from using parks and sidewalks. Prepare an ADA Transition Plan and implement mitigation plans, as necessary.
- Policy 2.3: Address park safety concerns through community-based safety interventions.
  - Program 2.3.1: Continue to implement policies and programs known to improve safety and reduce crime without relying on law enforcement personnel including Populate the Park and the Park Watch Program and other recommendations in the PMP. Continue to engage a diverse group of stakeholders is consulted and involved in developing safety measures and recommendations.
  - Program 2.3.2: Target homeless outreach services in park areas and connect individuals experiencing homelessness with appropriate resources and case management services to secure rapid housing in a safe and welcoming environment.
- Policy 2.4: Ensure that parks and other key destinations (schools, retail, grocery stores, jobs) are accessible via alternative transportation modes.
  - Program 2.4.1: Work to expand and improve bicycle and pedestrian infrastructure to promote walkability and active transportation through the implementation of the Bicycle Master Plan.
  - Program 2.4.2: Work with local transit agencies to improve access and connectivity to transit as well as enhance transit amenities such as bus shelters, real-time information, etc., including access to the Metro L Line from the south.
  - Program 2.4.3: Coordinate with local transit agencies to provide more service types/options.
  - Program 2.4.4: Continue to encourage first/last mile connections between the L Line, grocery stores, City Hall, Library, and parks/recreation sites.
  - Program 2.4.5: Work with retail and commercial property owners to install bicycle amenities on their property such as bike racks, lockers, or repair stations through the implementation of the Bicycle Master Plan.
  - Program 2.4.6: Increase the number of pedestrian and bicycle paths shaded by trees for a more comfortable and inviting experience; prioritize implementing enhanced pedestrian and bicycle amenities in the environmental justice community.
  - Program 2.4.7: Assess sidewalks, ramps, pedestrian signal intersections, and bus stops to determine if physical barriers occur that would block or inhibit people with disabilities from access and use. Prepare and implement mitigation plans, as necessary.

**Goal 3:** Expand access to fresh, healthy, and affordable food and resources to reduce food insecurity.

- Policy 3.1: Incentivize and remove any potential barriers in the development of healthy food establishments.
  - Program 3.1.1: Continue to ensure that adequate zoning opportunities exist throughout Monrovia to encourage new healthy food retail business that meet the needs of the community.
  - Program 3.1.2: Continue to promote and support Monrovia's farmer's market. If additional markets are determined to be economically viable in the future, work with local community members to identify ideal locations for regularly scheduled farmers' markets south of Interstate 210.
  - Program 3.1.3: Continue to support community agriculture/food production, such as the City's Pilot community gardens program and cottage food operations, by providing interested individuals with information and resources. Look for opportunities to expand in the future if a need exists.
- Policy 3.2: Ensure that residents have the knowledge, skills, and resources that are conducive to healthy eating habits.
  - Program 3.2.1: Partner with existing active living, nutrition, and school programs, such as Kaiser Permanente's Healthy Balance Program, to provide culturally relevant educational programming on healthy living.
  - Program 3.2.2: Organize free healthy living events, such as those provided at the Monrovia's pilot program Community Garden, night markets or food fairs, that provide live cooking demonstrations, workshops, food giveaways, taste tests, etc.
  - Program 3.2.3: Support the expansion of food assistance benefits (e.g., CalFresh, WIC, SNAP) at healthy food establishments, farmers' markets, etc.

**Goal 4:** Protect human and environmental health by restoring and improving potable water resources and protecting land uses and air quality from future contamination.

- Policy 4.1: Protect potable water resources from future contamination.
  - Program 4.1.1: Enforce existing green strategies and infrastructure to support a sustainable approach to stormwater management, urban runoff, flood management, groundwater recharge and infiltration, and landscaping, such as the Low Impact Development (LID) Ordinance.
  - Program 4.1.2: Develop a multi-lingual outreach campaign that educates and trains residents and businesses on preserving and maintaining healthy watersheds.
  - Program 4.1.3: Provide technical and financial assistance to low-income households to implement water conservation measures in their homes.
  - Program 4.1.4: Coordinate with local and regional agencies to continue and, as needed, expand remediation efforts for contaminated surface water, groundwater, and soils.
- Policy 4.2: Improve air quality conditions and minimize air quality impacts on sensitive population groups, by reducing point source emissions (ozone, small particulate matter, diesel particulates), particularly in the environmental justice community.
  - Program 4.2.1: Collaborate with industrial businesses to improve outdoor air quality through enhanced operations and other pollution reduction measures where possible.
  - Program 4.2.2: Encourage smoke-free workplaces, multi-family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke and coordinate with local advocacy groups to identify more potential smoke-free areas.
  - Program 4.2.3: Continue to support the efforts of the South Coast Air Quality Management District (SCAQMD) to identify, monitor, and reduce air pollutants.
  - Program 4.2.4: Require new sensitive land uses to include feasible measures such as setbacks, landscaping, ventilation systems, and other effective measures to minimize potential impacts from air pollution.
  - Program 4.2.5: Maintain designated truck routes to avoid residential areas and other sensitive areas, especially in the environmental justice community.

- Program 4.2.6: Preserve and enhance natural landscapes and tree canopies in and around the environmental justice community to minimize air pollution impacts and heat exposure. Promote the use of drought tolerant and native species in landscaped areas.
- Program 4.2.7: Support programs promoting the installation of electric vehicle charging stations within public parking lots and continue to explore removing barriers for private entity installations.
- Policy 4.3: Protect sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure, particularly in the environmental justice community.
  - Program 4.3.1: Limit the siting and construction of new large-scale hazardous waste producers and facilities on or near sensitive land uses in and around the environmental justice community.
  - Program 4.3.2: Continue to ensure compatibility between sensitive land uses and heavy industrial uses and other potentially harmful facilities.

**Goal 5:** Support meaningful and inclusive participation in the decision-making process of all community members, particularly those belonging to marginalized groups.

- Policy 5.1: Facilitate the involvement of residents, businesses, and organizations in all aspects of the planning process using a variety of community-based strategies.
  - Program 5.1.1: Develop an equity-focused Community Outreach Plan that outlines strategies and best practices for facilitating community participation and incorporating community input into the decision-making process. Be aware of, and take measures to address, cultural considerations that may impact a person's involvement in the public realm.
  - Program 5.1.2: Continue to develop and foster relationships and partnerships with community-based organizations, including the Monrovia Area Partnership (MAP).
  - Program 5.1.3: Continue to utilize a variety of communication techniques and social media tools to convey information to the public and ensure information is available in multiple languages, as needed.
  - Program 5.1.4: Provide more opportunities for environmental justice community residents to volunteer with the City as a way to further build local relationships.
  - Program 5.1.5: Continue to promote and utilize the Leadership Academy to engage, educate and empower traditionally underrepresented populations to become involved in the public decision-making process.

**Goal 6:** Promote and expand job opportunities, community programs, and services throughout the city with a focus on environmental justice communities.

- Policy 6.1: Promote equitable economic outcomes by providing and maintaining a range of middle-skill and high-skill jobs as well as attracting diverse employment opportunities.
  - Program 6.1.1: Diversify employment opportunities by promoting and targeting various industries that offer sustainable living wages.
  - Program 6.1.2: Continue to facilitate the development of industrial and commercial projects that provide living-wage opportunities. Consider providing financial and technical assistance to facilitate the desired business and industries.
  - Program 6.1.3: Encourage the Monrovia Unified School District and Citrus College to develop and implement talent development strategies and incentives to maximize opportunities for local employment.
  - Program 6.1.4: Coordinate partnerships between major employers, higher-education institutions, and Monrovia Unified School District to develop a highly skilled workforce through programs such as Youth Employment Services (YES).
  - Program 6.1.5: Support innovative opportunities for establishing workforce programs, such as green infrastructure maintenance.
- Policy 6.2: Promote health equity and access through policy evaluation and health valuation.
  - Program 6.2.1: Evaluate and remove local governmental constraints that might hinder the provision of high-quality healthcare services and resources are accessible and near residential neighborhoods, particularly to those in the environmental justice community.

- Program 6.2.2: Adopt and apply land use regulations to support a wide range of high-quality, accessible, and affordable healthcare and mental health facilities to meet the needs of all residents and employees.
- Program 6.2.3: On a periodic basis, monitor and evaluate local policies that may result in poor health outcomes amongst vulnerable populations, such as persons living in poverty, older adults, children, persons with disabilities, and immigrants.

### **ZONING TEXT AMENDMENT**

To respond to a number of State law requirements, the Zoning Text will be amended. The specific text amendment language prepared by the City would be adopted at a later time. The subject of the text amendments are described below:

- Require by-right approval of housing development that includes at least 20 percent of the units as housing affordable to lower-income households on the 800 S. Myrtle Avenue site
- Include Low-Barrier Navigation Centers as a by-right use in areas zoned for mixed-use and nonresidential zones permitting multifamily uses
- Allow supportive housing as a by-right use in zones where multifamily and mixed-uses are permitted
- Allow transitional and permanent supportive housing in all zones allowing residential uses, subject to the same permitting
- Remove CUP requirements for multifamily developments, small lot subdivisions, and ADUs in the HFZ zone
- Develop objective design standards for multifamily development
- Identify SROs as a conditionally permitted use within certain commercial zones
- Allow mobile and manufactured homes fixed to a foundation as permanent dwellings in all residential zoning districts where single-family dwellings are permitted by right
- Clarify allowed uses and applicable standards in zoning districts allowing mixed-use

### **General Plan Buildout**

The City of Monrovia General Plan Land Use and Circulation Elements were last updated in 2008 and provide a guide for the overall development in Monrovia through 2030. The 2008 update established goals and policies to guide long-term decision-making regarding land use, circulation, and related issues. While the 2008 General Plan applies to all properties within the City of Monrovia, the proposed land use changes included in the document were concentrated into three “focus areas” that the City had identified as most suitable for increased development intensity: Station Square Transit Village, South Myrtle Avenue, and West Huntington Drive. The following are City objectives stated in the Land Use Element:

- To attain a balanced mix of land use within the City, thereby providing residents with ready access to housing, employment, and commercial services;
- To work toward regional jobs/housing balance goals;
- To encourage private investment in the City;
- To ensure that residents from all income levels have access to decent, affordable housing;
- To revitalize specific areas of the City which could benefit from public and private redevelopment efforts;
- To create a City environment which makes Monrovia a pleasant place to live, work, shop, and do business; and
- To ensure development in Monrovia is sensitive to the City’s existing architectural and natural/open space resources.

Impacts associated with implementation of the 2008 General Plan were evaluated in a Draft and Final General Plan EIR (General Plan EIR). The General Plan EIR evaluated the construction of 3,746 net new dwelling units, which were expected to be constructed incrementally through 2030, with most of the City’s growth occurring in the focus areas. According to California



Department of Finance data, Monrovia had 14,212 housing units in 2008. The proposed 2021-2029 Housing Element states there are currently 15,084 dwelling units within the City. Table 4 shows the estimated remaining residential dwelling unit development potential by subtracting the 2021 existing dwellings from the 2030 projection used in the EIR for the 2008 update.

**Table 4: Residual General Plan Dwelling Unit Capacity**

<b>Buildout</b>	<b>General Plan EIR</b>
2008 Existing Housing Units	14,212
Estimated Increase in Housing Units by 2030	3,746
Total Estimated Buildout 2030	17,958
2021 Housing Units (Existing)	15,084
Residual General Plan Development Potential	2,874

As shown in the last row of Table 4, there are an estimated 2,874 dwelling units remaining until the 2030 buildout is met.

The site inventory, included in the Housing Element Update, identifies a potential of 1,248 units that can be developed to meet the City's RHNA goal on Inventory Sites that do not require changing the current General Plan land use designations. Of the 1,248 potential units identified in the Housing Element Update, approximately 288 units are identified as Accessory Dwelling Units (ADUs). Since adoption of the 2008 General Plan, ADU regulations within the State have changed significantly; currently ADUs that are consistent with City standards and State law are now allowed by right with a building permit. For the Inventory Sites identified in the Housing Element Update, the majority of potential dwelling units are located within the boundaries of existing focus areas identified by the 2008 General Plan. All the Inventory Sites that are located outside of focus areas are within 0.25 miles of a focus area.

The Housing Element Update Inventory Sites include a total of 1,248 potential units that could be developed. Additionally, there have been approximately 1,444 units associated with projects that have been approved by the City that are in the permitting or construction phases of development. These Inventory Site units and approved units total 2,692 units; this is less than the remaining capacity evaluated within the General Plan EIR. Furthermore, the proposed Project does not include any changes to the existing General Plan land use designations or Zoning designations, and the Inventory Sites' dwelling units could be developed with the existing designations. As such, the analysis within this document considers the potential Housing Element Update dwelling unit buildout to be consistent with the housing unit buildout evaluated within the General Plan EIR.

### ***Surrounding Land Uses***

The Housing Element, Safety Element, Environmental Justice Element and Zoning Text Amendments apply throughout the City. Uses consist of a full range of suburban, foothills, and National Forest land uses.

### ***Environmental Setting***

The City of Monrovia is a largely built-out suburban community well served by a network of freeways and commuter rail lines. Both City departments and utility companies provide a full suite of public services: water, sewer, flood control, telecommunications, law enforcement, fire prevention and emergency response, parks and recreation, and education.

The City of Monrovia is located in the San Gabriel Valley. The northern portion of the City extends into the foothills of the San Gabriel Mountains and abuts the Angeles National Forest. The terrain in the City slopes gently south from the foothills. Within the central and southern portion of the City, the topography is generally flat. Local geologic conditions affecting development include the presence of the Raymond Fault and the Sierra Madre Fault Zone (which can be further divided into five faults, which includes the Duarte Fault located within the City).

The City is located in the South Coast Air Basin, over which the South Coast Air Quality Management District has regulatory authority. The basin experiences frequent episodes of high ozone and PM<sub>2.5</sub> criteria pollutants

The key noise sources in the community include vehicular noise from freeways and arterial roadways, as well railroad noise.

***Required City Approvals***

The City Council adoption of: (1) a General Plan Amendment to incorporate the 2021-2029 Housing Element, the Safety Element Update, and the new Environmental Justice Element into the General Plan; and (2) Zoning Text Amendment.

***Other Agency Approvals***

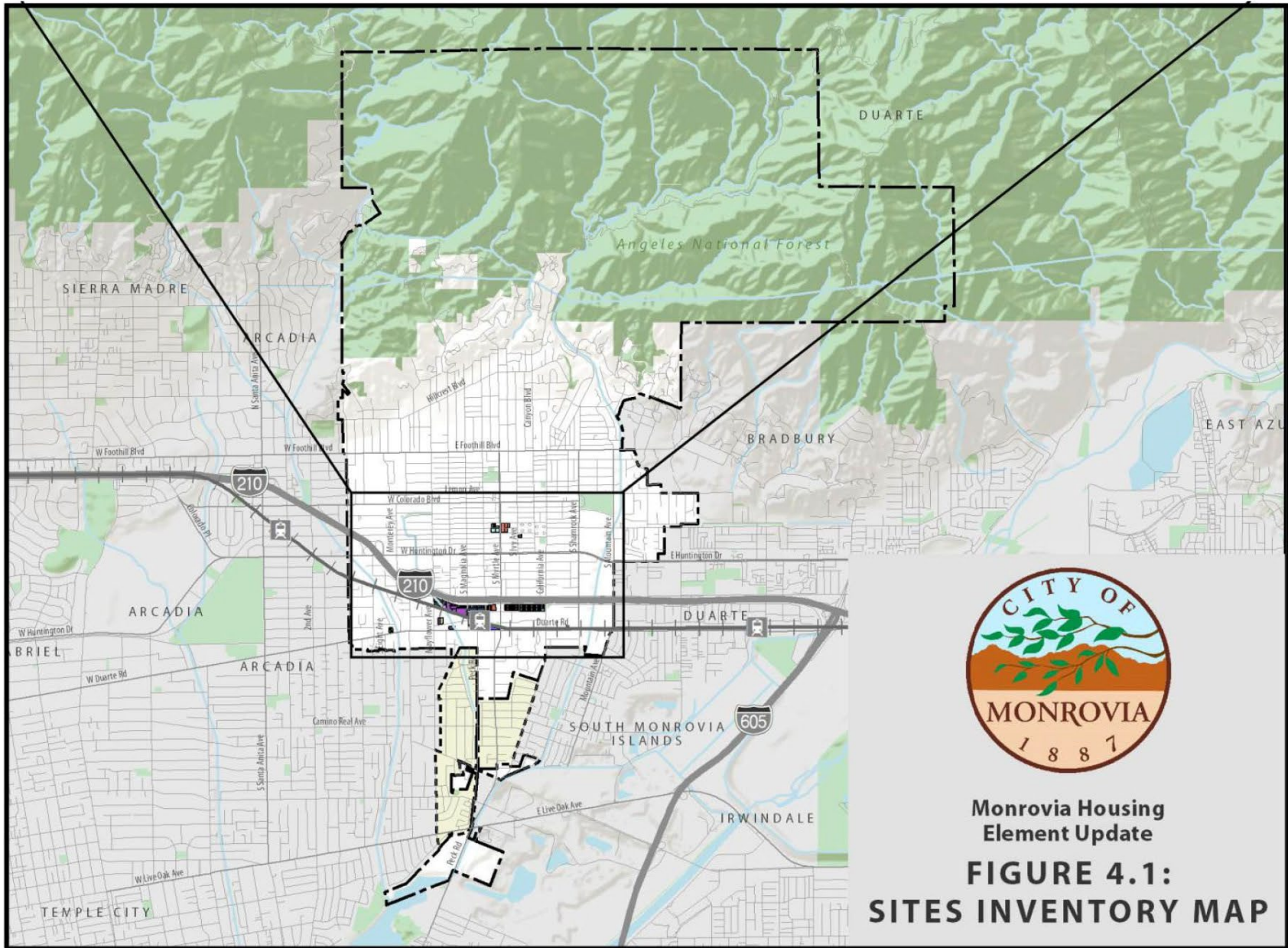
The State of California, Department of Housing and Community Development (HCD) is required to review the Housing Element for compliance with State law (Article 10.6 of the California Government Code) but does not have actual approval authority.

The California Geological Survey was consulted as part of the Safety Element drafting. The Element requires Cal Fire review, as it has very high-fire severity areas located within the jurisdiction.

**PUBLIC REVIEW AND COMMENTS**

The Draft IS/MND was circulated for public review and comment from September 1, 2022 through October 3, 2022, and received a total of three comment letters. Written responses to questions and comments as well as text revisions to the IS/MND are provided in memorandum form and included in this Final IS/MND as Appendix A. The following comment letters were received by the City during the public review period:

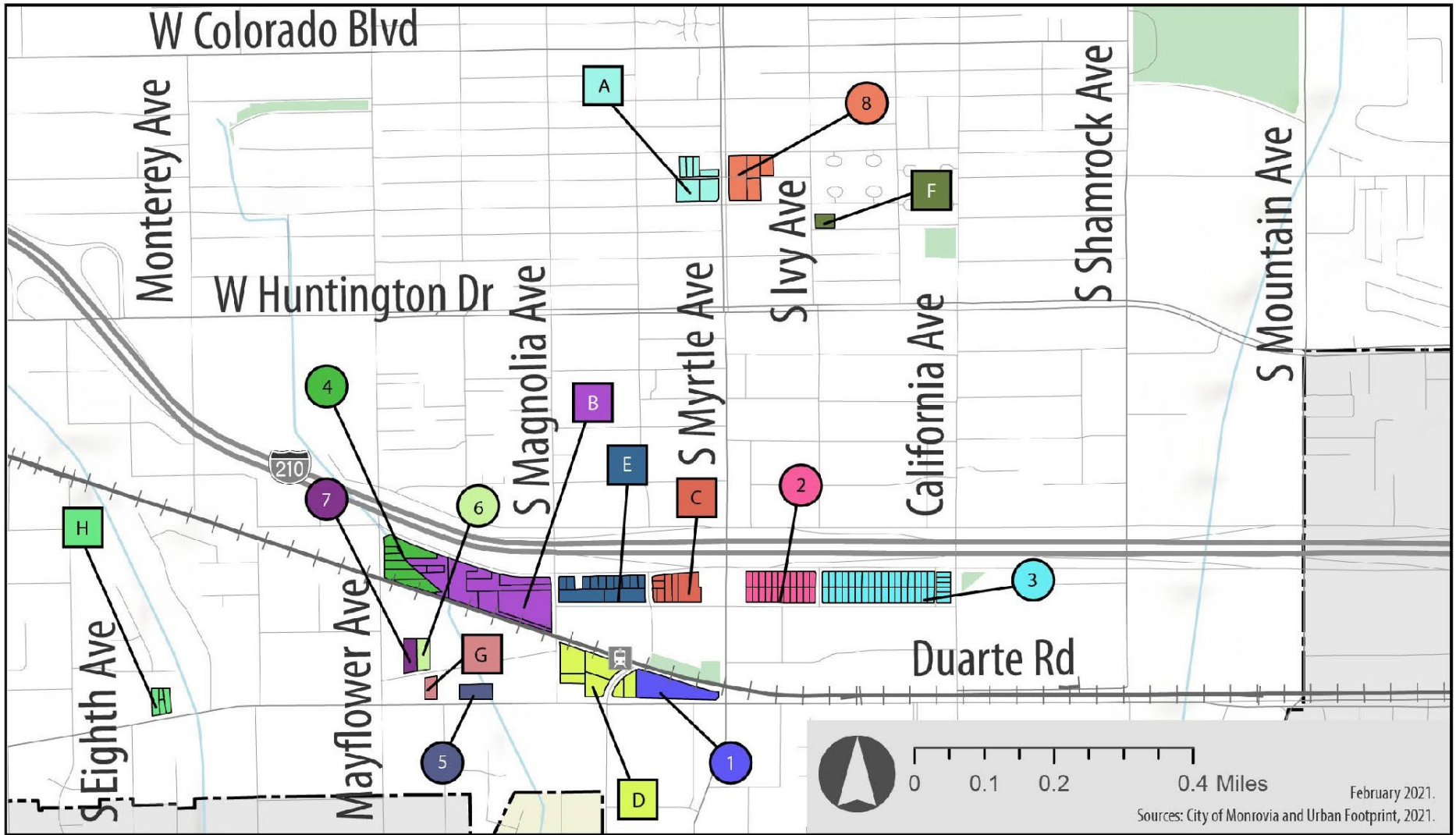
- Letter 1: Miya Edmonson, LDR/CEQA Branch Chief, District 7, California Department of Transportation
- Letter 2: Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation
- Letter 3: Mandy Huffman, Environmental Planner, Facilities Planning Department, Los Angeles County Sanitation Districts



**Exhibit 2 Regional Context and Vicinity Map**

Housing, Safety and Environmental Justice Elements Update IS/MND  
 Monrovia, California





### Exhibit 3 Monrovia Sites Inventory

Housing, Safety and Environmental Justice Elements Update IS/MND  
 Monrovia, California



### 3 DETERMINATION

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project and have been identified as a "Potentially Significant Impact," as indicated by the Initial Study Checklist questions in Section 4.1 through Section 4.20.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology /Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology / Water Quality	<input type="checkbox"/>	Land Use / Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population / Housing	<input checked="" type="checkbox"/>	Public Services
<input checked="" type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities / Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

#### DETERMINATION

On the basis of this initial evaluation:

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

\_\_\_\_\_  
 Sheri Bermejo, Planning Manager  
 City of Monrovia

\_\_\_\_\_  
 Date

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## 4 EVALUATION OF ENVIRONMENTAL IMPACTS

Please note that for the discussion within this Initial Study, the proposed 2021-2029 Housing Element Update, Safety Element Update, Environmental Justice Element, and Zoning Text Amendment together are referred to as “the Project,” “the proposed Project,” or “proposed Project.”

Since the policy documents (Housing Element Update, Safety Element Update, and Environmental Justice Element) do not specifically authorize the construction of any development, nor do these documents specifically indicate where and when specific housing projects will occur, this Initial Study examines the potential environmental impacts only at a programmatic level.

### 1. AESTHETICS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** As described in the General Plan EIR, the City of Monrovia does not have any identified scenic vista, scenic resources, or scenic highways within the Planning Area. Future development pursuant to the General Plan would be required to comply with the goals, policies, and design guidelines provided as part of the Land Use Element to ensure that future development projects are designed to complement and blend in with existing visual character of the neighborhood. Future development projects that would occur under the proposed Project would adhere to existing zoning and General Plan land use designations, including Inventory Sites identified as part of the Housing Element Update. The City contains no designated scenic vistas. Impacts to scenic vistas would be less than significant and no mitigation is required.

**B) Less Than Significant Impact.** Scenic resources are isolated, natural or manmade objects offering a unique visual display to the onlooker, in contrast to the expanse and variety of aesthetic values offered in scenic vistas. As described in the General

Plan EIR, the City of Monrovia does not have any identified scenic vista, scenic resources, or scenic highways within the planning area (i.e., the City's corporate boundaries and unincorporated Sphere of Influence).

According to the California Department of Transportation (Caltrans) website, there are no freeways within the City of Monrovia that are designated as scenic or eligible to be designated as a scenic highway or route (Caltrans 2021). The closest eligible scenic highway is State Route 39, located approximately two miles east of the City. The view west from State Route 39 to the central part of Monrovia is largely obscured by intervening development and topography. Future development projects associated with implementation of the proposed Project would not result in a significant impact to a scenic resource within a state scenic highway. The impact would be less than significant and no mitigation is required.

**C) Less Than Significant Impact.** Visual character is the composite physical values of a structure or structures, in context of the built and/or natural environment, that include architectural treatment, landscaping, location, and the intangible qualities such as historical context or uniqueness that establish a thematic visual display for the onlooker when viewing the location. Compared to other environmental topics, defining visual character is generally subjective, relying on the opinion of the onlooker coupled with the expertise and institutional knowledge of the local jurisdiction to define the visual character of an area or property.

The visual character of the City varies by location as there are distinct neighborhoods that exhibit their own nature and character. Undeveloped hills define the visual character of the northern part of the City. Commercial uses are located off of East Foothills Boulevard and South Myrtle Avenue, with additional commercial, industrial, and larger "big box" commercial development located in the vicinity of Interstate-210 (I-210). Single-family residential neighborhoods are spread throughout the City. The City contains little vacant land but many parcels of various sizes with older light industrial uses are slowly being redeveloped with modern uses.

Future development projects associated with implementation of the proposed Project would have the effect of incrementally changing the visual character of individual parcels. If the change in the visual character or quality of any Inventory Sites identified within the Housing Element Update, in context of the existing visual character and quality of the surrounding environment, can be perceived as 'degrading', then the effect of the project may result in potentially significant impacts.

There is no widely recognized threshold for determining when the effects of a project 'degrade' visual character or quality to the point that potentially significant environmental impacts could occur. However, the current CEQA threshold is whether or not a project (in an urbanized area) would conflict with applicable zoning and other regulations governing scenic quality. Thus, future development on the Inventory Sites identified within the Housing Element Update would be subject to applicable General Plan Policies and zoning regulations related to height, mass and scale, architectural style, materials, landscaping, and a variety of other standards that would ensure future housing development is consistent with the visual character intended for the area. The proposed Project does not include changes to any General Plan land use or zoning designations of any parcel. Accordingly, impacts would be less than significant with implementation of existing regulations and no mitigation is required.

**D) Less Than Significant Impact.** Future development projects associated with implementation of the proposed Project would result in new sources of light and glare. Outdoor lighting would be required in parking lots and pedestrian pathways for security purposes and may be included as accent lighting in landscaping and architectural features. Indoor lighting would also likely be visible through windows. Outdoor lighting, when viewed at night, can result in glare that can be defined as "excessive, uncontrolled brightness" from a luminaire. Glare can also occur during the day due to light reflecting off building materials such as highly polished metal and reflective glass. Inappropriate installation of light and reflective materials in future housing could result in effects on nighttime and daytime views through scattering excessive light in the viewers' eyes, causing a partial or complete inability to see due to light scattering in the eye.

The General Plan EIR found that impacts related to light and glare would be less than significant with implementation of the mitigation measures included in the EIR. These mitigation measures are as follows and would be applicable to any project proposed within the City:



- **Mitigation Measure AES-A:** For development proposals subject to environmental review and/or design review, the City will examine potential light and glare effects associated with structures and on-site activities, and will ensure that features are incorporated into projects to avoid any adverse light and glare impacts.
- **Mitigation Measures AES-B:** Title 17 (Zoning Code) shall be revised to prohibit the use of reflective glass, metallic, and other highly reflective and glare producing materials in new building construction.

Furthermore, future development projects would be subject to the City's Municipal Code, which includes provisions addressing light and glare. Implementation of the lighting requirements of the Municipal Code would ensure that lighting is appropriately designed to provide necessary security while not creating undue nuisance or hazards for people at surrounding properties or on roadways. Additionally, future development projects would be subject to standards enumerated in the City's code and other regulatory documents, requiring review by staff that would limit the use of highly reflective materials thereby minimizing the potential for daytime glare. Impacts would be less than significant with implementation of existing regulatory requirements and compliance with General Plan EIR Mitigation Measures AES-A and AES-B. Accordingly, no additional mitigation measures are required.

## 2. AGRICULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**A) No Impact.** According to the “Important Farmland Finder” within the state’s Farmland Mapping and Monitoring Program (FMMP) website, the land within the City is designated as Urban and Built Up, Grazing Land, or Other Land. The General Plan EIR found there would be no significant impacts related to the loss of important farmland by future development within the City.

The proposed Project does not re-zone or re-designate any parcel within the City from agricultural uses or zones to other uses. In addition, the proposed Project does not propose any specific development that would result in the conversion of farmland to non-agricultural use; Inventory Sites identified within the Housing Element Update are located within urban areas. Implementation of the proposed Project would result in no impacts related to the conversion of important farmland. No mitigation is required.

**B) No Impact.** The General Plan EIR stated there are no Williamson Act contracts applicable to the Planning Area. The proposed Project does not include re-zoning or re-designation of any parcel from agricultural uses or zones to other uses.

Implementation of the proposed Project would result in no impacts related to the loss of land under a Williamson Act contract. No mitigation is required.

**C-D) No Impact.** Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' The General Plan Map does designate areas of the northern part of the City as Hillside Wilderness Area, Forest/Recreation Area, and Angeles National Forest. All the Inventory Sites identified in the Housing Element Update are located within urban areas that include development or are adjacent to development; thus, there are no forest lands located on the proposed Inventory Sites. The proposed Project includes revised goals, objectives, and policies to the Safety Element Update, which are meant to reduce fire hazards within the City; these provisions would not result in a rezoning of forest land or conversion of forestland to a non-forest use. The proposed Project would not result in direct loss or substantial changes to any forest land. There would be no impact, and no mitigation is required.

**E) No Impact.** As discussed above, there is no designated farmland within the City. While there are forest related uses within the northern portion of the City, no changes are proposed to these areas. The proposed Project would not result in the conversion of any agricultural or forest land to non-agricultural or non-forest uses. There would be no impact; no mitigation is required.

### 3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) are the federal and State agencies charged with maintaining air quality in the nation and California, respectively. The U.S. EPA delegates much of its authority over air quality to CARB, which has geographically divided the State into 15 air basins for the purposes of managing air quality on a regional basis. An air basin is a CARB-designated management unit with similar meteorological and geographic conditions.

The City of Monrovia is located in South Coast Air Basin (Basin). The Basin encompasses approximately 10,600 square miles, and air quality in the Basin is managed by the South Coast Air Quality Management District (SCAQMD). Pursuant to the California Clean Air Act, SCAQMD is responsible for bringing air quality within the basin into conformity with federal and State air quality standards by reducing existing emission levels and ensuring that future emission levels meet applicable air quality standards. SCAQMD works with federal, State, and local agencies to reduce pollutant emissions through adoption and implementation of rules and regulations

The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O<sub>3</sub>), particulate matter (PM), which consists of “inhalable coarse” PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM<sub>10</sub>) and “fine” PM (particles with an aerodynamic diameter smaller than 2.5 microns, or PM<sub>2.5</sub>), CO, nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. The U.S. EPA refers to these six common pollutants as “criteria” pollutants because the agency regulates the pollutants on the basis of human health and/or environmentally-based criteria and because they are known to cause adverse human health effects and/or adverse effects on the environment. CARB has also established California Ambient Air Quality Standards (CAAQS) for the six criteria air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS).

**A) Less Than Significant Impact.** Future development that requires CEQA review would have to demonstrate consistency with the SCAQMD’s regional and local significance thresholds. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993), this analysis would include compliance with the Air Quality Management Plan (AQMP) if a project: is consistent with the growth assumptions in the AQMP (Criterion 1) and does not increase the frequency or severity of an air quality standards violation or cause a new one (Criterion 2).

The General Plan EIR determined that this potential air quality impact of the General Plan would be less than significant. As described in the General Plan EIR, the Land Use and Circulation Elements are intended to encourage pedestrian and transit connections within the City such that residents would rely less on their automobiles. The SCAQMD typically deems a project inconsistent with air quality plans if it results in population and/or employment growth that exceeds estimates in the applicable air quality plan or generates unusually large emissions. Although the General Plan included new residential housing and employment which would result in population and employment growth, this growth is within the regional growth projections established by SCAG, as described in the General Plan EIR. Furthermore, the General Plan accommodates and encourages mixed-use development as a means of creating more compact land use patterns for walking, biking, and using public transit. Finally, the General Plan fully supported extension of Gold Line Light Rail service to Monrovia to reduce commuter vehicle trips, which has occurred. Therefore, as described in the General Plan EIR, the intent of the General Plan is consistent with the AQMP, and the impact would be less significant at the programmatic level. As noted previously, the development associated with the Inventory Sites identified in the Housing Element Update would fall within the development levels evaluated within the General Plan EIR. Therefore, impacts would be less than significant, and no mitigation is required.

**B) Less Than Significant Impact.** The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SCAQMD in its *CEQA Air Quality Analysis Handbook* (SCAQMD 1993) and, furthermore, would be determined to potentially conflict with implementation of the AQMP. The General Plan contains the following goal related to air quality:

- **GOAL 9:** Support the development of a network of regional roadway facilities that ensures the safe and efficient movement of people and goods from within the City to areas outside its boundaries, and that accommodates regional travel demands and maintains air quality standards.

The General Plan EIR identified the following air quality mitigation measures, which would be applicable to projects within the City:

- **Mitigation Measure AIR-A:** If project-level analysis demonstrates that NO<sub>x</sub> emissions would be significant, the project shall provide a plan, for approval by the City, demonstrating that the heavy duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will utilize all feasible measures to reduce the emissions to a less than significant level. Acceptable options for reducing emissions may include use of late model low emission diesel engines, alternative fuels, engine retrofit technology, and/or other options as they become available. The SCAQMD web site provides specific information on mitigation options for off-road and on-road construction equipment.
- **Mitigation Measure AIR-B:** The following measure shall be incorporated into all project specifications to reduce diesel engine emissions of O<sub>3</sub> precursors including ROG and NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and diesel PM:

**Idling Restrictions.** Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

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

- **Mitigation Measure AIR-C:** The City shall require that all new residential fireplaces shall be fueled by natural gas. Wood stoves and wood burning fireplaces shall be prohibited.
- **Mitigation Measure AIR-D:** The City shall require applicants to complete a Health Risk Assessment (HRA) to determine the cancer risk to sensitive receptors for all residential projects located within 500 feet of Interstate 210 (I-210).
- **Mitigation Measures AIR-E:** The City shall require applicants to assess the potential impacts to children's respiratory health for all residential projects located within 500 feet of I-210.

The combined emissions from development in Monrovia and other cities in the San Gabriel Valley subregion will continue to exceed state and federal standards. As such, cumulative air quality impacts associated with the General Plan were considered to be significant and unavoidable. A Statement of Overriding Considerations was prepared for this significant impact which identified the several benefits of the General Plan, including providing needed housing.

As described in the General Plan EIR, construction-related air pollutant emissions would occur periodically throughout implementation of General Plan. While project emissions would be addressed in detail at the individual project level, mitigation measures applicable to all projects are required to reduce impacts at the programmatic level. Individual development projects would be required to assess potential impacts at the project level and implement mitigation measures AIR-A and AIR-B. Until the project-level analyses are completed, pollutant emissions associated with construction activity would be significant at the programmatic level.

Future development projects developed in accordance with the goals and policies of the Housing Element Update would have the effect of contributing incrementally to the mobile, energy, and area sources that cumulatively contribute to criteria pollutant levels and associated air pollution in the Basin. The proposed Project would be consistent with the growth anticipated in the General Plan and analyzed in its EIR. Therefore, the proposed Project is consistent with the findings of the General Plan EIR and would not create a new or significantly increased impact nor require additional mitigation at this programmatic level.

Future development projects would be subject to environmental evaluation pursuant to CEQA upon application for entitlement permits. Projects found to be exempt from CEQA would not have a significant impact on the environment as declared by state legislation. Other projects would be subject to standard analysis and mitigation, if required.

The proposed Project does not include any land use changes that were not already analyzed in the General Plan EIR. Therefore, long term air quality impacts in the City have already been analyzed, and the proposed Project would not result in impacts that are greater than those already evaluated in the General Plan EIR. In addition, future development on the proposed Inventory Sites identified within the Housing Element Update would be subject to the Goals and Policies of the General Plan and would be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA. Impacts would be less than significant with compliance with Mitigation Measures AIR-A through AIR-E. No mitigation is required.

**C) Less Than Significant Impact.** Common sensitive receptors include children under age 14, the elderly over age 65, athletes, and people with cardiovascular and chronic respiratory diseases. Housing projects are generally not considered uses that emit substantial levels of hazardous air pollutants that could have an effect on the environment such that potentially significant impacts would occur.

The General Plan does allow for more concentrated development in focus areas that could place residential uses within 500 feet of I-210. The General Plan EIR includes the following mitigation measures which would be applicable to all housing projects proposed within the City:

- **Mitigation Measure AIR-D:** The City shall require applicants to complete a Health Risk Assessment (HRA) to determine the cancer risk to sensitive receptors for all residential projects located within 500 feet of Interstate 210 (I-210).

- **Mitigation Measures AIR-E:** The City shall require applicants to assess the potential impacts to children's respiratory health for all residential projects located within 500 feet of I-210.

As described in the General Plan EIR, with implementation of mitigation, the programmatic level impacts to sensitive receptors from CO hotspots would be significant at the programmatic level. With implementation of mitigation, the impacts to sensitive receptors from TACs would be reduced to less than significant at the programmatic level. A Statement of Overriding Considerations was prepared for this significant impact which identified the various benefits of the General Plan.

The proposed Project is consistent with the growth anticipated in the General Plan and analyzed in its EIR. Therefore, the proposed Project is consistent with the findings of the General Plan EIR, would not create new or significantly increased impacts, and would not require additional mitigation at this programmatic level. Development of future housing would be subject to site-specific environmental evaluation pursuant to CEQA upon application for entitlement permits. Projects found to be exempt from CEQA would not have a significant impact on the environment as declared by state legislation. Other projects would be subject to standard analysis and mitigation, if required. The level of impact to sensitive receptors resulting from specific future development projects would be determined on a project-by-project basis. Impacts would be less than significant with compliance with General Plan EIR Mitigation Measures AIR-D and AIR-E.. No additional mitigation is required.

**D) Less Than Significant Impact.** Residential land uses generally do not generate permanent objectionable odors; therefore, future development projects would not result in effects related to odors that could impact a substantial number of people. Impacts would be less than significant, and no mitigation is required.

#### 4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**A) Less Than Significant Impact.** The central portion of the City of Monrovia is primarily an urbanized area. There are no significant amounts of native habitat remaining in the central portion of the City where the Inventory Sites are identified for the Housing Element Update. No land use or zoning changes are proposed for the undeveloped hillside areas of the City that could potentially contain sensitive habitat. As future development projects are proposed, they would be subject to environmental evaluation pursuant to CEQA upon application for entitlement permits, which would include an evaluation of site-specific habitat impacts.

The General Plan concentrates new development into previously developed areas of the City to take advantage of the Gold Line light rail service, and development pursuant to the General Plan would occur through redevelopment of previously developed parcels. The General Plan EIR analyzed impacts to sensitive species, and impacts were found to be less than significant. The proposed Project would not result in new or more severe impacts than previously contemplated in the General Plan EIR. The impacts would be less than significant, and no mitigation is required.



**B-C) Less than Significant Impact.** According to the National Wetlands Inventory, there are channelized drainages located within the central portion the City of Monrovia. While the Housing Element Update includes Inventory Sites located adjacent to these drainages, no changes are proposed within drainage channels. Any future development would include site-specific analysis to assess potential impacts to the drainage, and future development projects would be required to comply with existing regulations to protect water quality during construction and operational phases. Furthermore, the update to the Safety Element includes the following proposed action:

- Action 2.1.1.1: Implement the following development standards as flood control and landslide protection measures:
  - Provision shall be made to prevent surface waters from eroding natural and graded slopes.
  - Graded slopes over three feet in vertical height and all graded slopes to be maintained by a Landscape Maintenance District, or other City approved maintenance agreement, shall be planted to protect against erosion. Planting shall be in the ratio of at least one tree per three hundred square feet of slope and one shrub per one hundred fifty square feet, with ground cover sufficient to cover the bank within one year from planting.
  - For lots greater than 7,500 square feet, a hydrology report shall be submitted at the time a grading plan is submitted to the City. The hydrology report shall identify areas of possible inundation, downstream effects, natural drainage courses, conclusions, and recommendations regarding the effects of hydrologic conditions on the proposed development, opinions, and recommendations regarding the adequacy of facilities proposed for the site, and design criteria to mitigate identified hydrologic hazards. This report shall account for runoff and debris from tributary areas and shall provide consideration for each lot or dwelling unit site in a development. Runoff and debris volumes shall be computed using Los Angeles County Flood Control District criteria. This investigation and report shall be prepared by a registered civil engineer experienced in hydrologic investigation.

Future development associated with implementation of the proposed Project would not result in significant impacts to any creeks, rivers, or other water bodies with adherence to existing policies and regulations. Impacts would be less than significant and no mitigation is required.

**D) Less than Significant Impact.** The City of Monrovia is primarily an urbanized area. No native habitat remains in the central portion of the City where Housing Element Inventory Sites are located. Wildlife associated with the Inventory Sites would be adapted to disturbed urban sites and would not be substantially affected by the proposed Project. No changes are contemplated for the hillside areas of the City that potentially contain sensitive habitat. Future development projects on Inventory Sites, which are located within urban and developed areas of the City, would not result in significant impacts to wildlife corridors or native wildlife nursery sites. Any future development projects in hillside areas would be subject to environmental evaluation pursuant to CEQA upon application for entitlement permits, which would include an evaluation of site-specific habitat impacts. Impacts would be less than significant and no additional mitigation measures are required.

**E) No Impact.** City of Monrovia Municipal Code Section 17.20.040 describes the Oak Tree Preservation Ordinance. The purpose of this section is the preservation of healthy oak trees and to establish regulations for the removal and pruning of oak trees. Future development projects associated with implementation of the proposed Project would be subject to Monrovia's Oak Tree Preservation Ordinance. Implementation of the proposed Project would not conflict with any locally adopted ordinance or regulation. No impact would occur, and no mitigation is required.

**F) No Impact.** As described in the General Plan EIR, there are no established Natural Community Conservation Plans (NCCPs) or Habitat Conservation Plans (HCPs) within the City of Monrovia. Development associated with implementation of the proposed Project would not conflict with any NCCP or HCP. No impact would occur, and no mitigation is required.

## 5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** As described in the General Plan EIR, Monrovia’s establishment was the product of the real estate boom of the 1880s that set the stage for enormous growth patterns for the Los Angeles area. Incorporated in 1887, Monrovia is the fourth oldest city in the county. Numerous historic residences are located in Monrovia. Three structures are listed on the National Register of Historic Places (NRHP): the Aztec Hotel located at 311 West Foothill Boulevard, the Oaks located at 250 North Primrose Avenue, and the Upton Sinclair House located at 464 North Myrtle Avenue. In addition, the Santa Fe Railroad Depot located at 1709 South Myrtle Avenue is potentially eligible for listing on the NRHP. There are no State Historic Landmarks designated in Monrovia; however, numerous structures within the City are 45 years of age or older; generally, structures need to be at least 50 years or older to be considered historical resources. Further, the existing and proposed General Plan Land Use Policy Maps designate the portion of Old Town Monrovia on Myrtle Avenue between Olive Avenue and Foothill Boulevard as Historic Commercial Downtown.

The General Plan Land Use Element contains the following goals and policies to protect and preserve historic resources:

- **Goal 9: Preserve the character of existing neighborhood and historic residences.**
  - Policy 9.1: Continue to implement the historic preservation ordinance for designating, preserving, safeguarding historic structures, and creating historic districts in the City.
  - Policy 9.2 Facilitate the use of state and federal funds for the preservation of historic buildings by seeking to qualify as a Certified Local Government (CLG).
  - Policy 9.3: Continue to monitor development standards in single family and multi-family residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.
  - Policy 9.4: Continue to refine as needed, design guidelines for new multiple-family residential development in order to promote consistency and compatibility with the City’s older development.
  - Policy 9.5: Restore the Santa Fe Depot, preferably as a facility open to the public. (e.g., rail station, restaurant, shopping facility).
  - 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.
  - Policy 9.7: Through the existing Planned Development (PD) designations control the architecture and site design of residential developments for compatibility with the existing neighborhood.

- Policy 9.8: Continue the street tree and sidewalk pattern in new development where Medium Density and PD neighborhoods have an established street tree and sidewalk pattern.
- Policy 9.9 Complete the City-wide survey and prepare a City-wide inventory of potentially historic structures.
- Policy 9.10 Assist and encourage other public agencies or private organizations in the purchase and/or relocation of sites, buildings, and structure that have been identified as historically significant that are in danger of demolition or alterations that could jeopardize their status as historic resources.
- Policy 9.11 Consider the adoption of special development standards for properties surrounding identified historic sites and structures to ensure compatibility of new development with the old. Such development standards could include requirement of a Conditional Use Permit for development of properties surrounding identified historic sites and structures.
- Policy 9.12 Consider providing restoration assistance to owners of historic sites and/or structures in return for agreements or deed restrictions prohibiting their destruction or alteration inconsistent with their historic character.

At the programmatic level, the City has policies and practices in place to protect historic resources, including the City's Historic Preservation Ordinance. All potentially eligible historic resources are reviewed by the Historic Preservation Commission as part of the City's development review process. No demolition or alteration to a historic landmark or historic district may occur without obtaining a Certificate of Appropriateness from the Historic Preservation Commission. The intent of this review is to allow the City the opportunity to explore alternatives with the applicant, such as relocation and adaptive reuse, and possible mitigation to reduce adverse impacts from demolition.

Continued application of existing regulations would avoid significant adverse impacts on historic resources from implementation of the General Plan and the Housing Element Update, at the programmatic level. The significance of impacts to historic resources resulting from future development projects would be determined on a project-by-project basis. CEQA review would be required for all projects involving potential historic resources. If project-level impacts are identified, specific mitigation measures would be required per CEQA. By following existing General Plan goals and policies, as well as applicable laws and regulations, alteration of any potentially historic structure, or structures within a historic district would ensure that the significance of a potential resource is considered on a project-level. Impacts would be less than significant, and no mitigation is required.

**B) Less Than Significant Impact.** As described in the General Plan EIR, there are no known archaeological sites within the City. Nevertheless, unknown archaeological sites may be unearthed during excavation and grading activities for specific projects. Infill development in already developed area is not anticipated to result in the uncovering of additional resources. However, deep excavations for parking facilities could unearth artifacts. Development of previously undeveloped sites, such as those located in the foothills, could disturb artifacts given the former presence of indigenous people in the region. Prior discoveries of archaeological resources in the region have been limited to projects located within two sensitive geologic formations: Topanga Formation and Late Miocene Marine Monterey Formation. The potential for discovery of new resources has not been ruled out by the City. The General Plan EIR includes the following mitigation measure to address unknown archaeological sites:

- **Mitigation Measure CUL-A:** Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional.

Implementation of General Plan EIR Mitigation Measure CUL-A is required to reduce the level of impact to less than significant at the programmatic level. However, the significance of impacts to archaeological and paleontological resources resulting from future development projects would be determined on a project-by-project basis. Individual development projects could result in

significant impacts to archaeological and paleontological resources. If project-level impacts are identified, specific mitigation measures would be required per CEQA.

In addition, two state laws (SB 18 and AB 52) require cities to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. This is considered regulatory compliance and not specific mitigation under CEQA.

The General Plan EIR concluded that build out of the General Plan would result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources with implementation of Mitigation Measure CUL-A. The Project does not propose any land use changes or zoning designations that were not already analyzed in the General Plan EIR. Therefore, long-term impacts in the City have already been contemplated, and the proposed Project would not result in impacts that are greater than those analyzed in the General Plan EIR. In addition, future development of the proposed Inventory Sites would be subject to the goals and policies of the General Plan and would be subject to review in compliance with CEQA requirements. Impacts would be less than significant with compliance with General Plan EIR Mitigation Measure CUL-A.

**C) Less Than Significant Impact.** Future development projects associated with implementation of the proposed Project that require site preparation and earthmoving activities have the unlikely potential to uncover buried or surficial human remains outside of a recognized cemetery or other burial location. Construction activities that result in disturbing or destroying human remains could result in impacts to our knowledge of the burial practices of the people who were buried, the people who buried the remains, and the pre-historic or historic context and circumstances under which the buried became deceased. Should human remains be discovered, project proponents are required to comply with State Health and Safety Code §7050.5. This requires halting work in the immediate area of the find and notifying the County Coroner, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of Native American origin, the Coroner is required to contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Implementation of existing regulations would ensure that any discovered remains are appropriately collected and examined for any significant information that can be elicited. Impacts on human remains would be less than significant with implementation of existing regulations, and no mitigation is required.

## 6. ENERGY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** Energy is primarily categorized into three areas: electricity, natural gas, and fuels used for transportation. According to the U.S. Energy Information Administration (USEIA), California is the most populous state in the United States (representing 12 percent of the total national population), has the largest economy, and is second only to Texas in total energy consumption. However, California has one of the lowest per capita energy consumption levels in the U.S. This is a result of California’s mild climate, extensive efforts to increase energy efficiency, and implementation of alternative technologies. California leads the nation in electricity generation from solar, geothermal, and biomass resources (USEIA 2021).

**Electricity.** In 2020, a little over one-half of California’s net electricity generation was non-CO2 emitting electric generation categories, including hydropower. Total generation for California was 272,576 gigawatt-hours (GWh) (CEC, 2021). Southern California Edison (SCE) is the electricity provider in Monrovia. In fiscal year 2019, about 48 percent of the power the electricity that SCE delivered to customers came from carbon-free resources.

**Natural Gas.** California accounts for less than 1 percent of total U.S. natural gas reserves and production; however, almost two-thirds of California households use natural gas for home heating. The Southern California Gas Company (SoCalGas) provides natural gas service to the City SoCalGas is the principal distributor of natural gas in Southern California and provides natural gas for residential, commercial, and industrial markets.

**Transportation.** California is the second-largest consumer of petroleum products, after Texas, and accounts for 10 percent of the nation’s total consumption. The state is the largest U.S. consumer of motor gasoline and jet fuel, and 85 percent of the petroleum consumed in California is used in the transportation sector. Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific formulations required by the California Air Resources Board.

**Proposed Project.** Future housing associated with implementation of the proposed Project would have the effect of contributing to increased energy consumption in the City, which would be part of regional growth in energy use. Future growth in the City would be required to be consistent with the state’s energy conservation regulations as codified in Title 24 of the California Code of Regulations (CCR) and the California Green Building Code. In addition, future development projects must meet the local requirements of the City’s Energy Action Plan (Monrovia 2008).

The Housing Element Update includes the following energy conservation policies and program:

- Policy 4.8: Promote modifications to increase energy efficiency and the use of alternative energy sources such as solar energy, cogeneration, and non-fossil fuels.

- Policy 4.9: Encourage energy conservation, water efficiency, and sustainable building measures in new and existing homes through adherence to the California Green Building Code.

**PROGRAM 4.8: ENERGY CONSERVATION.** The City will:

- Support the incorporation of sustainable practices in the construction, rehabilitation, and maintenance of housing in the community.
- Continue to encourage energy-efficient design and energy conservation, and help residents minimize energy-related expenses. Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects.
- Provide information on available home loan programs (such as Benji) and encourage residents to use the programs to implement energy efficient design.
- Encourage and explore additional funding opportunities for energy conservation devices, including but not limited to lighting, water heater treatments, and solar energy systems in all residential projects.
- Review ordinances and recommend changes where necessary to encourage energy-efficient housing design and practices that are consistent with State regulations and advances in technology. Continue to enforce the State energy standards of the California Green Building Code.
- Ensure compliance with AB2188 by adopting a solar ordinance including a streamlined permitting process.

Future development projects would be required to adhere to these multiple energy conservation plans and requirements; thus, the proposed Project would not use energy in a wasteful, inefficient, or unnecessary manner. Impacts relative to energy consumption and efficiency would be less than significant, and no mitigation is required.

**B) Less Than Significant Impact.** The analysis in Section 6.A above demonstrates that the proposed Project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed above, future development projects implemented under the Housing Element Update would be subject to the California Title 24 Building Code energy efficiency standards for residential and non-residential buildings, as well as Housing Element Update policies and programs addressing energy, which would help reduce energy consumption overall within the City. Future development projects would also be subject to the local requirements of the City's Energy Action Plan (City 2008).

Equipment and vehicles associated with construction and operation of future development projects would also be subject to fuel standards at the state and federal level. Truck traffic from some new non-residential development would inherently benefit from programs implemented to achieve the goals of the state's Sustainable Freight Plan, such as the turnover of older, less fuel-efficient trucks, as fuel economy standards are rolled out and zero emission vehicles (ZEV) trucks and vehicles in general becomes more widely available and cost effective for businesses and residents. Therefore, the proposed Project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation is required.

## 7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A.i) Less Than Significant Impact (Fault Rupture).** Alquist-Priolo earthquake fault zones are areas surrounding surface traces of active faults in California. The City of Monrovia is located in a seismically active region. According to the California Department of Conservation mapping, faults that are located within the City include the Raymond Fault and the Sierra Madre Fault Zone (which can be further divided into five faults, which includes the Duarte Fault located within the City). These faults are located within existing developed area that includes residential, commercial, and other types of urban land uses. Fault rupture can result in serious to catastrophic damage to structures if the rupture occurs under the structure and causes injury or death to any occupants inside.

The Safety Element Update includes several proposed policies that address seismic safety, including the following:

- Policy 1.1.1: No structures for human occupancy are permitted on or across the trace of the Raymond Hill Fault. Prior to approval of development of properties within the Alquist-Priolo Geologic Studies Zone, as delineated by the California Division of Mines and Geology, an applicant shall submit a report of the geologic investigation of potential faults that may affect structures proposed at the site. The Report shall be required for parcel maps, tract maps, development on residential lots, and residential additions adding floor area for human occupancy, and shall be prepared by a Registered Geotechnical Engineer registered with the State of California.
- Policy 1.1.2: Properties located within known or potential fault areas shall be required to submit a geotechnical report at the time of submittal of the parcel or tract map, or for development on residential lots with single family dwellings, or additions to dwellings that add floor area for human occupancy (see policy 1.1.4). The report shall analyze the surface and subsurface geology of the site, the degree of seismic hazard and shall include conclusions and recommendations regarding the effect of geologic conditions on the proposed development, opinions and recommended criteria to mitigate any identified geologic hazards. This investigation and report shall be performed by a professional geotechnical engineer experienced in the practice of engineering geology and registered with the State of California.
- Policy 1.1.3: Modifications to the setback limits specified by the Alquist-Priolo Act may be permitted at the discretion of the City, if such modifications also comply with the Municipal Code, based on a geotechnical report prepared by an independent licensed geotechnical engineer and/or geologist, mutually agreed upon between the City and developer and paid for by the developer. The geotechnical report shall be reviewed and subject to the approval of the City Engineer or his designee and shall be maintained on file by the City. The recommendations made in the geotechnical report may be approved, modified or denied by the City. Setback modifications may be permitted only if the developer and/or owner executes and records a restrictive covenant, in a form acceptable to the City Attorney, against the title to the property.

Such a restrictive covenant shall specifically define and require compliance with the permitted setbacks on the property and any applicable conditions required by the geotechnical report. Such restrictive covenant shall run with the land, be binding on successors in interest, acknowledge that the applicable setbacks have been modified at the request of the property owner in reliance on a geotechnical study, and further require that the property owner hold harmless, indemnify and defend the City, its officers, agents and employees from and against any liability or damage in any way arising out of the construction, maintenance and use of residential structures on the property.

- Policy 1.1.4: Geotechnical reports submitted in response to the standards above shall be reviewed for adequacy by a Registered Geotechnical Engineer, and a report of that review submitted to the appropriate agency of the City. All costs for the preparation of these required reports are to be borne by the developer/applicant.
- Policy 1.1.5: A geotechnical report, prepared by a geologist registered with the state, shall be provided for all projects listed below located within an Alquist-Priolo Special Studies Zone:
  1. All new buildings for human occupancy. This shall include single family dwellings, guest houses and rental units.
  2. Additions to buildings discussed in Item 1 above when the area of the addition will exceed 50% of the area of the existing building.
  3. Any conversion from a building not used for human occupancy into one which is. (Authority: Section 3603(c), Title 14, CCR.)

No report shall be required for accessory buildings such as garages, tool sheds, swimming pool dressing rooms, etc. since these buildings are not normally used for human occupancy more than 2,000 person-hours per year.

- Policy 1.2.1: Advocate and support state legislation that would require existing vital facilities to be brought into compliance with modern seismic design and construction standards.
- Policy 1.3.1: Continue to adopt and implement the most recent uniform building code (with special attention to Chapter 23 and Chapter 70), and all supplements which include the latest most stringent earthquake regulations for new construction.



- Policy 1.3.2: If an EIR, or if detailed geologic investigation confirms existence of seismic hazards, the City shall require special earthquake resistant design features or use limitations, as appropriate, to protect the public health and safety and to reduce the exposure of individuals and property to seismic risks.

The Inventory Sites identified in the Housing Element Update are not within Alquist-Priolo zones. New housing would be subject to state seismic safety requirements of the California Building Code as adopted by the City. Therefore, impacts related to fault rupture would be less than significant and no mitigation is required.

**A.ii) Less Than Significant Impact (Groundshaking).** As the City is within a seismically active region, future development projects would experience seismic shaking. Development within the City must adhere to the California Building Code (CBC), which includes requirements to design structures in accordance with the appropriate ground-shaking design parameters set forth in the code. As future housing projects would be subject to state seismic safety requirements of the California Building Code as adopted by the City, impacts related to seismic groundshaking would be less than significant and no mitigation is required.

**A.iii) Less Than Significant Impact (Liquefaction).** Liquefaction occurs when water-saturated sediment temporarily loses strength and acts as a fluid. Liquefaction-induced ground failure historically has been a major cause of earthquake damage in Southern California. Liquefaction potential and severity depends on several factors, including soil and slope conditions, proximity to fault, earthquake magnitude, and type of earthquake. According to California Geological Survey mapping, areas subject to liquefaction are located in the northern portion of the City.

The Inventory Sites included in the Housing Element Update are not identified as being located in an area that includes liquefaction. Housing may still be developed in other areas of the City which may be more susceptible to liquefaction. The Safety Element Update includes the following proposed action to address soils conditions:

- Action 2.1.1.1: Implement the following development standards as flood control and landslide protection measures:
  - For all projects that require grading, a soils engineering report shall be required to include data regarding the nature, distribution and strengths of existing soils, conclusion and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading. This investigation and report shall be performed by a professional soil engineer experienced in the practice of soil mechanics and registered with the State of California.

New housing would be subject to state seismic safety requirements of the California Building Code as adopted by the City. Impacts related to seismic liquefaction would be less than significant and no mitigation is required.

**A.iv) Less Than Significant Impact (Landslides).** Landslides typically occur in areas with steep, unstable slopes. According to California Geological Survey mapping, areas within identified landslide zones are located in the northern portion of the City. The nine Inventory Sites included in the Housing Element Update are not identified as being located in an area susceptible to landslides. Housing may still be developed in other areas of the City which may be more susceptible to landslides. As described in the General Plan EIR, the City requires geological and geotechnical investigations of all new development in seismic and geologic hazard areas. Impacts related to landslides would be less than significant with compliance with existing standards, and no mitigation is required.

**B) Less Than Significant Impact.** Natural forces, both chemical and physical, are continually at work breaking down and moving rocks, minerals, and soils. Erosion poses environmental hazards through the effect of removing soils that can undermine roads and buildings and destabilize slopes. Erosion can also result in environmental damage by depositing soils in downstream reservoirs, lakes, and drainage structures that can result in impacts to wildlife and human health by changing the ecological properties or the physical boundaries of the water body or drainage control device.

Future development projects associated with implementation of the proposed Project would be subject to Federal and State regulations limiting erosion, including NPDES requirements and SCAQMD rules. Grading and erosions control provisions of the Municipal Code, including those outlined in Chapter 15.28, would also be applicable to future development projects associated with implementation of the proposed Project. Therefore, impacts would be less than significant, and no mitigation is required.

**C) Less Than Significant Impact.** Please see Sections 7.A.iii and 7.A.iv for a discussion of liquefaction and landslide hazards. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Land subsidence is a gradual settling or sudden sinking of the Earth's surface due to subsurface movement of earth materials. Over drafting of ground water, drainage of organic soils, underground mining, natural compaction, and thawing of permafrost can cause subsidence. Similar to collapse and settlement, subsidence causes large areas of land to sink, thereby potentially damaging foundations, walls, and floors.

Site-specific soil conditions vary based on location. Future development projects associated with implementation of the proposed Project would be subject to state seismic safety requirements of the California Building Code as adopted by the City. As described in the General Plan EIR, the City requires geological and geotechnical investigations of all new development in seismic and geologic hazard areas; these investigations would identify site specific design and construction guidelines to protect occupants and structures from anticipated seismic impacts, including liquefaction, lateral spreading, landslides, subsidence, or collapse. Impacts related to unstable geology or soils would be less than significant and no mitigation is required.

**D) Less Than Significant Impact.** Expansive soils are those that greatly increase in volume when they absorb water and shrink when they dry out. Expansion is measured by shrink-swell potential defined by the relative volume change in soil while gaining in moisture. If the shrink-swell potential is rated moderate to high, damage to buildings, roads, and other structures can occur.

Future development projects associated with implementation of the proposed Project would be subject to the requirements of the California Building Code (CBC) as adopted by the City, including preparation of a soils engineering report, as noted in proposed Action 2.1.1.1 of the Safety Element Update. The CBC requires analysis of soils and application of engineering standards to ensure project sites are made suitable for building construction, particularly in regard to foundation design. Foundation and structural design for proposed development would be subject to analysis and design recommendations by a licensed geotechnical engineer for review and approval by the City. In addition, the General Plan requires the preparation of preliminary soil, geotechnical, or seismic reports, as applicable. Therefore, impacts due to geological and soils hazards would be less than significant and no mitigation is required.

**E) Less Than Significant Impact.** The Inventory Sites identified within the Housing Element Update are located in areas currently served by wastewater systems. Should housing be developed in areas where septic systems are proposed, all provisions of the California Building Code, California Plumbing Code, and City requirements would be applicable. These provisions include confirmation that soil conditions are adequate for the operation of a septic system. Impacts due to septic systems would be less than significant with compliance with all applicable codes and ordinances, and no mitigation is required. .

**F) Less Than Significant Impact.** According to the General Plan EIR, no paleontological sites are known to exist within the City. Nevertheless, unknown fossils may be unearthed during excavation and grading activities for specific projects. Infill development in already developed area is not anticipated to result in the uncovering of additional resources. However, deep excavations for parking facilities could unearth artifacts. Development of previously undeveloped sites, such as those located in the foothills, could also disturb artifacts. Prior discoveries of archaeological and paleontological resources in the region have been limited to projects located within two sensitive geologic formations: Topanga Formation and Late Miocene Marine Monterey Formation. The potential for discovery of new resources has not been ruled out by the City. Impacts could be potentially significant in these areas. Implementation of General Plan EIR Mitigation Measure CUL-A is required to reduce the level of impact to less than significant at the programmatic level.

- **Mitigation Measure CUL-A:** Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional.

The significance of impacts to paleontological resources resulting from future development projects would be determined on a project-by-project basis. If project-level impacts are identified, specific mitigation measures would be required per CEQA. Thus, compliance with General Plan EIR Mitigation Measure CUL-A ensures less than significant impacts related to paleontological resources.

## 8. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less than Significant Impact.** Climate change is the distinct change in measures of climate for a long time period. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth’s orbit around the Sun or direct changes within the climate system itself (i.e., changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet’s surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline, and diesel for transportation); methane from landfill wastes, raising livestock, and deforestation activities; and some agricultural practices.<sup>1</sup>

Greenhouse gases differ from other emissions in that they contribute to the “greenhouse effect.” The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the Earth’s surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth’s temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

The General Plan EIR did not evaluate GHG impacts as that environmental issue was not considered in CEQA documents at that time. However, the housing growth anticipated under the Housing Element Update is consistent with development anticipated in the General Plan EIR, which concluded overall development would have significant air quality impacts, and a Statement of Overriding Considerations was adopted for that significant adverse and unavoidable impact. The proposed Project is consistent with the growth anticipated in the General Plan and analyzed in its EIR. No changes in General Plan land use or development intensities are proposed in connection with the proposed Project. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Therefore, the proposed Project is consistent with the findings of the General Plan EIR, would not create new or significantly increased impacts, and would not require additional mitigation.

Future development projects would emit greenhouse gases from various sources depending on type of use and size of the project. All projects would be required to estimate their GHG emissions and comply with the City’s Energy Action Plan as appropriate, which also helps reduce GHG emissions. Therefore, impacts would be less than significant at this programmatic

<sup>1</sup> United States Environmental Protection Agency. *Frequently Asked Questions About Global Warming and Climate Change. Back to Basics.* April 2009.

level and no programmatic mitigation is needed as significant, adverse and unavoidable Air Quality impacts were already addressed in the General Plan EIR. Implementation of the proposed Project does not create any new or more severe impacts than were evaluated within the General Plan EIR. Future development projects would be required to determine project-specific GHG emissions, design features, and mitigation measures, as applicable, to reduce the production of GHG emissions. Impacts regarding the production of GHG emissions would be less than significant, and no mitigation is required.

**B) Less than Significant Impact.** In 2008, the City adopted an Energy Action Plan (EAP) which includes goals for the city's future and sets forth commitments to achieve these goals through specific actions. These actions would ensure that sufficient, dependable, and reasonably-priced electrical power and energy supplies are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for the city's consumers and taxpayers. This plan looks at self-generation and demand reduction strategies that can further offset the energy, water, and transportation needs for the city of Monrovia, including the use of renewable energy sources.

The Inventory Sites identified in the Housing Element Update are located within an urban and developed area of the city. GHG emissions would be evaluated during the City's standard environmental review process as required by CEQA. Applicable measures would be incorporated into future development projects, ensuring GHG emissions are reduced.

Some future development projects may be required to identify a GHG emissions inventory using regulatory and industry standard methodologies and measures. Future development projects would also be required to comply with the City's Energy Action Plan which also helps reduce GHG emissions. Therefore, impacts would be less than significant at this programmatic level and no programmatic mitigation is needed. In addition, future development projects would be required to determine compliance with the EAP and other applicable plans or regulations relative to GHG emissions. Impacts would be less than significant in regard to compliance with applicable GHG plans, policies, or regulations that reduce GHG emissions, and no mitigation is required.

## 9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

**A-D) Less than Significant Impact.** Residential and mixed-use housing development do not cause or contribute substantially to potential hazards to the public or the environment because these uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. For purposes of the following analysis, a “significant hazard to the public or the environment” is characterized by the effects of exposure to hazardous materials and/or wastes from a facility or facilities that are subject to operations-specific federal, state, regional, or local regulations and implementation processes (including permitting, accident contingency, and clean-up requirements) based on the amount of material or waste undergoing use, transport, or disposal and the resulting impacts to human health or ecosystem functions.

Residential uses are characterized by the use of common, widely available hazardous materials including paints and other solvents, cleaners, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of

at local landfills. Use of common household hazardous materials are not subject to federal or state permitting at the consumer level, and it is reasonably foreseeable that upset and accident conditions would not be caused by the use, transport, and disposal of such materials and wastes from future residences. Consumer-level household hazardous materials and wastes are not subject to federal or state permitting by the consumer, and their use is at such levels as to not have the potential to result in risk of upset or accident that could harm a substantial number of people, including children attending schools in the area, or have a substantial effect on the functions of the local or regional ecosystem.

**Hazardous Sites:** There is one Housing Element Update Inventory Site that is included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Inventory Site 2 is located at 145 W. Duarte Road and is included on a list of leaking underground storage tanks compiled by the State Water Resources Control Board database. Information for this site indicates that cleanup actions associated with this site were completed and the case was closed in 1994. Additionally, Inventory Site 1 is included on the Department of Toxic Substance Control (DTSC) EnviroStor database, but the database indicates that the voluntary cleanup of this site has been certified and completed. In addition, CEQA requires the assessment of risk involving the transportation, disposal, manufacture, storage, and handling of any hazardous materials for new development. Therefore, future development projects on proposed Inventory Sites would be required to assess impacts due to the accidental release of hazardous materials as part of standard environmental review procedures pursuant to CEQA and City policy.

**Materials and Wastes Transport:** Hazardous materials pass through the City in route to other destinations via rail, surface streets, and freeways. While train derailment can occur at any time, it is during an earthquake that a derailment and hazardous materials release would pose the greatest risk of hazards. The City has no direct authority to regulate the transport of hazardous materials on local and regional roadways or railways; however, under upset and accident conditions, it is reasonably foreseeable that most of the spill would be contained within the right-of-way of a roadway with minimal chance of hazardous materials or wastes reaching adjacent homes. On the other hand, it is reasonably foreseeable that train derailment would result in extensive impacts to adjacent residents as the train and multiple train cars leave the tracks and violently careen with the adjacent environment. Transportation of hazardous materials and wastes by truck and rail is regulated by the U.S. Department of Transportation (DOT). DOT regulations establish criteria for safe handling procedures. Federal safety standards are also included in the California Administrative Code. The California Health Services Department also regulates the haulers of hazardous waste but does not regulate all hazardous materials. Although there is some reasonably foreseeable potential for exposure of future residents to hazardous materials and wastes under upset and accident conditions, federal and state regulations are in place with a focus on prevention of accidental releases and measures for appropriate containment and cleanup when accidents occur.

**Facilities:** According to the EnviroStor website of the California Department of Toxic Substances Control, the City of Monrovia has 12 total facilities listed within the city, although only two of the sites are identified as active. These active sites are located south of Interstate 210 in an area with a history of industrial uses. Both the federal government and the State of California require all businesses that handle hazardous materials or extremely hazardous materials to submit a business risk management plan to the local Certified Unified Program Agency (CUPA). The business risk management plan must include an inventory of the hazardous materials and emergency response plans and procedures to be used in the event of a significant release of a hazardous material. Implementation of federal and state requirements for the operation of these types of facilities would ensure that exposure to residential uses would be minimized or avoided.

Considering the preceding analysis, the implementation of proposed Project would not result in effects from the use, transport, or disposal of hazardous or acutely hazardous materials or wastes, under normal or upset and accident conditions, which could impact human health or the environment with implementation of existing regulations, standards, and General Plan Policy. Impacts would be less than significant; no mitigation is required.

**E) Less than Significant Impact.** Airport safety issues and their connection with land use planning are generally associated with hazards posed by departing and landing aircraft crashes and the effects those crashes could have on uses and people on the ground. Development within the approach and departure zones of an airport or airstrip are subject to the effects of potentially widespread, although rare, aircraft crashes; therefore, the denser the development and population within these

zones, the greater the risk of impacts to human health. Aircraft crashes can result in the substantial loss of property and life depending on the size of the aircraft, its velocity, the pitch, yaw, and roll at the moment of impact, and the type of cargo it is carrying. Development within the vicinity of an airport can result in increased potential for impact due to height, glare, and electronic interference that can disrupt flight patterns and pilots operating out of the airport.

The Los Angeles County Airport Land Use Commission (ALUC) is responsible for ensuring that development within the vicinity of an airport does not cause undue risk to airport operations or the safety of persons on the ground. The commissioners represent the county, its cities, and the public. Legislation passed in 1982 established a direct link between airport land use plans and the land use plans and regulations adopted by cities and counties, as established in California Public Utilities Code Section 21676. In accordance with this legislation, the ALUC must review the general and specific plans of local jurisdictions for consistency with the county's airport comprehensive land use plan (CLUP). Primary and Secondary Review Areas must be identified for each facility. Projects proposed within the geographic boundaries of the Primary Review Area are referred to the ALUC for review and evaluation. Within the Secondary Review Area, only those projects involving a structure or other object with a height that would exceed that permitted under adopted land use zoning would be referred to the ALUC for review.

The closest airport to the City of Monrovia is the San Gabriel Valley Airport, which is less than two miles from the City. The City does not fall within the Airport Influence Area for the airport (DRP 2004). The proposed Project would not result in a safety hazard or excessive noise. This impact would be less than significant, and no mitigation is required.

**F) Less than Significant Impact.** The City's Local Hazard Mitigation Plan (LHMP), which was last updated in 2017, provides a framework for the identification and coordination of Hazard Mitigation strategies developed in the City of Monrovia with other plans, especially those developed by City departments, agencies, and organizations as well as those developed to file for federal disaster assistance. The City is part of a county and statewide emergency management system that addresses evacuation and movement of people in the event of an emergency. The proposed Project does not include any land use, circulation, or safety changes that could conflict with implementation of the Office of Emergency Management or other emergency response programs. This impact would be less than significant, and no mitigation is required.

**G) Less than Significant Impact.** As noted by CALFIRE Fire Hazard Severity Zone Maps, portions of the City are located in areas identified as very high hazard severity zones. These high hazard severity zones are generally areas that are, or adjacent to, undeveloped wildland areas. Portions of the City are identified as being under both local responsibility and state or federal responsibility.

The Safety Element Update includes several proposed goals, policies, and actions to reduce fire hazards, including:

**Goal 3:** Reduce the risk of fire and minimize consequences from fire events in Monrovia.

- Policy 3.1.1: Continue to plan for new construction and redevelopment that decreases the likelihood of fire and decreases the impacts of fire damage.
  - Action 3.1.1.1: Require development to provide adequate defensible space to minimize the risk of structural damage associated with wildland fires
  - Action 3.1.1.2: Require new development to be located in areas with adequate water supply and water supply infrastructure.
  - Action 3.1.1.3: Continue to implement the California Building and California Fire Codes, as well as the following policies and standards for hillside development:
    - Fire suppression access to natural chaparral areas shall be provided and maintained.
    - Landscape materials for the coverage and stabilization of graded slopes shall be selected to be compatible with surrounding natural vegetation and shall recognize climatic, soil, exposure, and ecological characteristics of the site. Plant materials that require substantial water after



becoming established shall be avoided. Native dry climate grasses and other materials shall be selected wherever feasible. (Fire Department approval required).

- Cantilevered construction, including stairs, balconies, porches, open structure under buildings shall be fire retardant construction and shall be protected by fire sprinklers, when applicable, which have been reviewed and approved by the Fire Department.
- Eaves shall be fully boxed in with exterior stucco or its equivalent. Vents shall be covered with one-sixteenth inch mesh or its equivalent.
- New roofs shall be class "All non-flammable materials."
- Flammable chaparral, excluding mature trees, on a lot within 200 feet of a home, shall be cleared, maintained, and replaced with vegetation to minimize fire hazard.
- Fire hydrants shall be provided and located within 300 feet of structures except where a greater distance is allowed by the Fire Chief in conjunction with the installation of automatic fire sprinklers. All water main installations will be "looped" with no dead-end main allowed.
- To provide adequate Fire Department access, foothill neighborhoods shall be linked with a continuous circulation system. Segments of that system may consist of emergency access roads.
- Action 3.1.1.4: Continue to enforce the following ordinances promoting fire prevention.
  - Enforce installation of fire alarm systems and or sprinklers to provide protection to life and property.
  - Enforce regulations requiring smoke detectors in all structures.
  - Enforce installation of chimney spark arrestors.
  - Prohibit the use of flammable roofing materials.
  - Continue to adopt, implement, and require new structures to incorporate latest California Building Code, California Fire Code (including a minimum of 40-foot right-of-way and a grade less than six percent to ensure adequate access for fire emergencies), Government Code sections 51175 and 51189 related to VHFSZ, and Board of Forestry and Fire Protection Fire Safe Regulations, among others.
  - To prevent life hazard and to protect the hillsides and residential, industrial, and commercial areas, enforce ban on use of all fireworks.
- Action 3.1.1.5: Control hazardous or potentially dangerous operations or land uses.
  - Require a conditional use permit for industrial operations involving the compounding of radioactive materials, petroleum refining, manufacturing of explosives, or any other operation of a dangerous nature.
  - Enforce ordinances prohibiting the igniting or burning of flammable materials on public or private property.
  - Restrict and regulate devices or equipment that could create fire, explosion, or bodily injury.
  - Restrict storage of flammable liquids and explosives to manufacturing zones.
- Action 3.1.1.6: Update zoning and/or building code to require residential and nonresidential structures have street numbers (and street name, as appropriate) visible from public and private roadways and alleys.

- Action 3.1.1.7: Identify all development that does not comply with current fire safety standards, in terms of road standards and vegetative hazard; establish and implement a mitigation plan to remedy the noncompliance.
- Action 3.1.1.8: Consider relocating and work with other agencies to facilitate the relocation of essential public facilities out of the high-risk, wildfire prone areas.
- Action 3.1.1.9: Avoid, if possible, or minimize new residential development in the VHFSZ.
- Action 3.1.1.10: Ensure that infrastructure located within VHFSZ has the capacity to support emergency services and operations.
- Action 3.1.1.11: Require all new essential public facilities be sited outside of the VHFSZ, when feasible.
- Action 3.1.1.12: Require new development within the VHFSZ provide a pre-plan, which includes:
  - location and direction of evacuation routes,
  - at least two points of ingress and egress,
  - maintenance of defensible space clearances around structures and subdivisions,
  - provision and maintenance of fuel breaks, and
  - provision and maintenance of roadside fuel reduction plan to prevent fires along public roads, and
  - a fire resistive vegetation landscape plan
- Action 3.1.1.13: Require all new and redevelopment occurring within the VHFSZ be designed, constructed, and maintained in accordance with the latest building and fire codes.
- Action 3.1.1.14: Ensure new and existing development located within the Very High Fire Severity Zone (VHFSZ) is designed to implement fire prevention measures.
- Action 3.1.1.15: Develop outreach programs that educate residents regarding:
  - evacuation routes and wildfire evacuations,
  - defensible space,
  - fire hazard impacts, such as structural damage, wildfire smoke, etc.,
  - fire prevention measures, and
  - structural hardening.
- Policy 3.1.2: Continue to allow structures and infrastructures located in the VHFSZ to be rebuilt or redeveloped, after a large fire, in accordance with the Building and Fire Codes in place at the time of the rebuilding.
  - Action 3.1.2.1: Periodically, consider amending the City's VHFSZ Rebuilding policy to ensure it reflects community vision and best practices.
- Policy 3.1.3: Ensure Monrovia's water supply and distribution system is adequate and appropriate to facilitate fire suppression.
  - Action 3.1.3.1: Develop and implement a plan to ensure the maintenance and long-term integrity of water supply and its supply infrastructure.
  - Action 3.1.3.2: Regularly assess the water supply systems for development are adequate to combat structural and wildland fires.

- Action 3.1.3.3: Ensure or install fire protection water systems for all new construction projects in the VHFSZ, including the installation of fire hydrants providing adequate water flow, fire sprinklers or suppression systems.
- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City's Evacuation Plan to identify the evacuation routes' capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
  - Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
  - Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.
- Policy 3.1.5: Continue to support and implement fuel management programs.
  - Action 3.1.5.1 Maintain or require the maintenance of fire hazard reduction projects, including but not limited to community fire breaks, private road clearance, and public road clearance.
  - Action 3.1.5.2: Regularly assess the effectiveness, and modify as appropriate, the City's SAFE Landscaping materials and Community Wildfire Protection Plan.
- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.
  - Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
  - Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
  - Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
  - Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
  - Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

The Inventory Sites identified in the Housing Element Update are not in, or adjacent to, areas identified within a very high hazard severity zone. If future development projects are proposed within, or adjacent to, areas identified as very high fire hazard severity zones, site-specific analysis would evaluate the specific fire risks at that location. Additionally, the Safety Element Update includes several policies to help reduce the risk of structure fire. This impact would be less than significant, and no mitigation is required.

### 10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:  (i) result in substantial erosion or siltation on- or off-site;  (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;  (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or  (iv) impede or redirect flood flows.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** The US Environmental Protection Agency (EPA), the Los Angeles Region Regional Water Quality Control Board (LARWQCB), and the Los Angeles County Health Department are responsible for monitoring and regulating groundwater in the San Gabriel Valley. The National Pollutant Discharge Elimination System (NPDES) permit is the primary regulation for storm water pollutant sources in the City of Monrovia. The NPDES was developed as part of the municipal storm water program to address storm water pollution from new development and redevelopment by the private sector.

The City of Monrovia’s Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) implement’s the City’s storm water quality management strategies consistent with its General Construction permit from the LARWQCB. These regulations are applicable to all storm water generated on any developed or undeveloped land within the City.

Housing is a common type of urban development and is addressed in the City waste discharge requirements for construction and operational sources of pollutants that can affect downstream surface water bodies by discharge into the local storm drain system. The Housing Element Update does not include any policies or programs that would conflict with implementation of the

NPDES program such that future residential development could result in exceedance of the waste discharge requirements and thus would not substantially impact downstream water quality. Furthermore, future development projects would be subject to environmental inquiry and potential review pursuant to CEQA. With the implementation of existing permit regulations, impacts related to violation of water quality standards and waste discharge requirements would be less than significant. No mitigation is required.

**B) Less Than Significant Impact.** The Housing Element Update identifies projected housing demand over the next eight years, which would require potable water for drinking, food preparation, cleaning, and bathing as well as water for landscape irrigation. Future development projects would generate demand for water in addition to the demand of existing uses and the incremental increase in demand as growth occurs in the area; therefore, the future development projects would contribute to cumulative, long-term increases in demand for groundwater and other water resources. Water is essential to the proper function of an ecosystem and human life and activities; thus, water shortages can impact the health and wellbeing of humans and the quality of the environment.

According to state law, local water agencies must regularly update their Urban Water Management Plan (UWMP) every 5 years and large development projects must prepare a separate water supply assessment (WSA) to identify how to avoid or reduce impacts on surface or groundwater supplies over a 20-year period even under drought conditions.

The proposed Project does not include any changes to the land use designations or zoning within the City; thus, impacts associated with the proposed Project would remain within the scope of analysis in the General Plan EIR. As described in the General Plan EIR, the City does not project a shortage in water supply nor would it need to pump more water from the Basin than it is allowed. Because the City can only pump water in accordance with its adjudicated rights, there would be no adverse impacts to groundwater supply; the impact would be less than significant at the programmatic level. As new development projects are proposed, the City would reassess its water supply through the environmental review process to ensure that sufficient supplies would be available before approving the project. Future development projects would be subject to environmental inquiry and possible project-specific environmental review pursuant to CEQA. As the level of development associated with the proposed Project is consistent with the analysis documented in the General Plan EIR; the proposed Project would result less than significant impacts related to groundwater supplies. No mitigation is required.

**C) Less Than Significant Impact.** Future development projects would likely occur on in urban areas on sites with impervious surfaces; significant changes to existing drainage channels or patterns are not expected. Projects located on currently or previously developed sites are unlikely to substantially change the hydrological conditions of the site. The concern with changes in on-site drainage is the potential for flooding, erosion, siltation, pollutant loading, and exceedance of storm drain capacity due to the lack of or improperly designed conveyance of runoff. The effects of changes in drainage patterns can result in impacts to human health and quality of life and the environment through damage or destruction of structures, sedimentation of downstream water bodies and the resulting impact to aquatic biological resources, decreased water quality with similar impacts to aquatic biological resources, and storm water backup that can result in similar types of flooding impacts.

The Safety Element Update includes the following proposed policies and actions to address flooding and erosion:

- Policy 2.1.1: Design new development to incorporate flood control measures.
- Policy 2.1.2: Monitor and adopt appropriate flood management programs.
- Policy 2.1.3: Design flood control infrastructure to accommodate existing and anticipated storm flows associated with changing climatic conditions.
- Policy 2.1.4: Coordinate with appropriate agencies to identify and construct needed local and regional flood control improvements to address areas of concern.
- Action 2.1.1.1: Implement the following development standards as flood control and landslide protection measures:

- Graded slopes, other than those constructed in rock, shall be planted or otherwise protected from the effects of storm runoff erosion and shall be benched or terraced as required to provide for adequate drainage. Planting shall be designed to blend with the surrounding terrain and development. Graded slopes in rock shall be provided with soil pockets to contain landscaping where appropriate. Irrigation facilities shall be provided where necessary for proper establishment and maintenance of the planted areas.
- Provision shall be made to prevent surface waters from eroding natural and graded slopes.
- Within six months, or such other period established by the Director of Public Works, after the commencement of grading activities, graded areas shall be stabilized as approved by the City Engineer. Slope planting shall not lag grading completion by more than six months.
- Grading on building sites shall not occur until specific site plans and elevations have been approved for the individual site except where, as part of a subdivision grading and public improvements, approved after a public hearing, the grading of a lot has been determined necessary for public safety (and is done in accordance with the intent and purpose of these policies.)
- Graded slopes over three feet in vertical height and all graded slopes to be maintained by a Landscape Maintenance District, or other City approved maintenance agreement, shall be planted to protect against erosion. Planting shall be in the ratio of at least one tree per three hundred square feet of slope and one shrub per one hundred fifty square feet, with ground cover sufficient to cover the bank within one year from planting.
- For all projects that require grading, a soils engineering report shall be required to include data regarding the nature, distribution and strengths of existing soils, conclusion and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading. This investigation and report shall be performed by a professional soil engineer experienced in the practice of soil mechanics and registered with the State of California.
- For lots greater than 7,500 square feet, a hydrology report shall be submitted at the time a grading plan is submitted to the City. The hydrology report shall identify areas of possible inundation, downstream effects, natural drainage courses, conclusions, and recommendations regarding the effects of hydrologic conditions on the proposed development, opinions and recommendations regarding the adequacy of facilities proposed for the site, and design criteria to mitigate identified hydrologic hazards. This report shall account for runoff and debris from tributary areas and shall provide consideration for each lot or dwelling unit site in a development. Runoff and debris volumes shall be computed using Los Angeles County Flood Control District criteria. This investigation and report shall be prepared by a registered civil engineer experienced in hydrologic investigation.
- Covenants, Conditions and Restrictions (CC&R's), including but not limited to development plans, common area and slope maintenance, private area landscaping and maintenance, shall be submitted and approved prior to the recordation of a final tract map.
- Hillside development shall provide all necessary sewers, storm drains, debris basins and other flood control measures as specified in specific plans.
- Action 2.1.1.2: Periodically update dam inundation maps and consider the proximity of dams in the site selection of vital public facilities.
- Action 2.1.1.3: Coordinate with the Los Angeles County Department of Public Works, the owner of all three dams, to develop Emergency Action Plans as required by State law.
- Action 2.1.1.4: The City Engineer will monitor the Cobey-Alquist Flood Plain Management Act for application in Monrovia.
- Action 2.1.1.5: Prepare an assessment of capacity needs of flood control and storm drainage infrastructure resulting from extreme weather caused by climate change.

As described in the General Plan EIR, the increase in impervious surfaces as a result of the General Plan build out would be limited because new development would primarily occur as a result of redevelopment of currently paved and developed sites. Compliance with existing City policies and development review procedures would ensure that runoff from new development projects would not exceed the capacity of the storm water drainage system. Proposed erosion control measures specified in

the City's Safety Element Update, and compliance with NPDES permit and City requirements, would ensure that erosion and sedimentation is limited. The impact of storm water runoff on drainage, flooding, and erosion would be less than significant and, no mitigation is required.

**D) Less Than Significant Impact.** Most of the City of Monrovia faces minimal flood hazards, as outlined by the Federal Emergency Management Agency (FEMA) hazard maps. While none of the Housing Element Inventory Sites are located within a 100-year flood hazard area, there are sites located within areas identified as Zone D, Flood Risk associated with levees. These areas are general located near storm drain channels. The Safety Element Update includes several policies related to flooding. Additionally, site-specific analysis regarding flooding potential would occur as part of future analysis of the specific development project in accordance with CEQA requirements.

The City of Monrovia is located within the inundation areas for Santa Anita Dam and Sawpit Debris Dam. A rupture of these dams (i.e., in the event of an earthquake, seiche, or catastrophic failure during a rain event) could result in inundation within the City. However, these reservoirs, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Therefore, impacts on safety as a result of a dam failure would be less than significant.

The City would require future development projects to demonstrate it is not impacted by a 100-year flood zone or what steps it would take to eliminate that risk. CEQA also requires projects identify specific criteria and conditions that must be met to avoid potential impacts from flood hazards such as application of flood hazard regulations, evaluation of development sites for flood hazard potential, and application of flood-proofing strategies. Therefore, impacts would be less than significant, and no mitigation is required.

*Seiche* is the process by which water sloshes outside its containing boundaries, generally due to an earthquake. Seiche can result in localized flooding that can result in property damage or personal injury. This could occur within an open reservoir, lake, or other large waterbody. The City does not contain any sizeable open reservoirs, lakes, or other large bodies of water, therefore, impacts resulting from the effects of seiche in the City would be less than significant and no mitigation is required. A *tsunami* is a large wave that generates in the ocean, generally from an earthquake, and builds intense strength and height before impacting a coast. Tsunami can result in significant property damage and loss of life due to the intense, destructive nature of the wave and the often-sudden occurrence with little chance for warning. The City would likely experience no impacts from the effects of a tsunami given its distance to the Pacific Ocean.

Therefore, the impacts of flooding, tsunami, or seiche and any related release of pollutants would be less than significant and no mitigation is required.

**E) Less Than Significant Impact.** This assessment is for both surface water management planning and sustainable groundwater management plans.

**Water Quality Control Plan.** The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) is the water quality control plan for the greater Los Angeles Basin, including the City of Monrovia. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan (CWB 2018). The proposed Project would not conflict with or obstruct implementation of a water quality control plan. Impacts would be less than significant, and no mitigation is required,

**Groundwater Management Plan.** In 2014 the governor signed the Sustainable Groundwater Management Act (SGMA) into law which requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California. As described in the Monrovia 2020 Urban Water Management Plan the Main San Gabriel Basin (Main Basin) is a sub-basin of the San Gabriel Valley Basin. Pursuant to the SGMA, the Main

Basin was named as an adjudicated groundwater basin and is exempt from the requirements of developing a GSP. Therefore, the proposed Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation is required.



## 11. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**A) No Impact.** Communities form neighborhoods within a broader assemblage of land uses, acting as physically bounded social networks that often define a person’s local sense of place and help shape an individual’s social and cultural perspective. A significant impact could occur if a Housing Element Update Inventory Site was sufficiently large or configured in such a way so as to create a physical barrier within an established community.

The Housing Element Update identifies Inventory Sites throughout the City of Monrovia. The Inventory Sites rely on existing land use designations to accommodate new residential development. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. The General Plan does not designate any established communities that would be affected by implementation of the proposed Housing Element Update; therefore, implementation of the proposed Project would not create any physical barrier within the community. Furthermore, implementation of the proposed Project would not require new infrastructure systems such as roadways or flood control channels not already planned and previously considered in the General Plan EIR. As such, the proposed Project would not divide or disrupt neighborhoods or any other established community elements. No impact would occur, and no mitigation is required.

**B) No Impact.** The proposed Project sets forth policies to encourage housing development consistent with adopted land use policies established in the General Plan. No changes in General Plan land use or development intensities are proposed. The Safety Element Update includes technical amendments to achieve compliance with State, regional and local policies and guidelines and incorporates data and maps to address vulnerability to climate change and wildfire. The Environmental Justice Element identifies disadvantaged communities, also known as Environmental Justice Communities, within the City’s General Plan planning area and establishes goals, policies, and programs to reduce unique or compounded health risks in Environmental Justice Communities. The Zoning Text Amendments responds to State law requirements. These four components of the proposed Project would not conflict with adopted General Plan goals and policies or other City regulations to mitigate impacts generated by development within the Planning Area, as specified in the General Plan EIR. No impact would occur, and no mitigation is required.

## 12. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### A-B) Less Than Significant Impact.

*Mineral Resources.* As described in the General Plan EIR, adoption of the General Plan, and any development pursuant thereto, would not result in the loss of known mineral resources, as no mineral resource areas have been designated in the City of Monrovia.

*Oil and Gas Wells.* According to the state Department of Conservation, there are currently no oil or gas wells within the City of Monrovia.

The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. The impact to mineral resources would be less than significant, and no mitigation is required.

### 13. NOISE

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** The predominant noise source in Monrovia is vehicular traffic. As described in the General Plan EIR, implementation of development associated with the General Plan is expected to increase vehicle traffic in Monrovia, as well as increases in vehicle traffic associated with regional growth. The increase in traffic would increase noise levels in Monrovia. However, the Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR.

The greatest noise impacts associated with vehicular traffic are anticipated to occur at sensitive receptor locations along high-traffic roadways segments. As demonstrated in Table 3.7-3 General Plan EIR, the noise analysis shows that increases in noise levels at most of the affected roadways would not be perceptible to the human ear (i.e., a less than 3 decibel increase). The General Plan EIR found that increases in noise levels due to more vehicles on the road would be perceptible along Huntington Drive between Mayflower Avenue and Myrtle Avenue (3 dBA) and along Central Avenue between I-210 westbound onramp and Myrtle Avenue (4 dBA). No sensitive receptors are located adjacent to Huntington Drive between Mayflower Avenue and Myrtle Avenue, and the Land Use Element does not include any sensitive receptor uses along this roadway segment. Thus, the impact was identified as less than significant in the General Plan EIR at the programmatic level, and no mitigation is required.

As described in the General Plan EIR, noise associated with non-residential uses, such as truck deliveries and parking lot activities, has the potential to increase ambient noise levels at nearby residential uses, as well as the residential uses that could also be developed as part of mixed-use projects under the proposed General Plan. However, the Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Activities associated with future commercial development in the City have the potential to affect future residential uses within these areas, as well as existing sensitive receptors. The programs within the Noise Element of the General Plan would assist in the reduction of noise levels at sensitive receptors. However, the General Plan EIR included Mitigation Measure NOISE-A to reduce noise levels experienced at nearby sensitive receptors to a less than significant level.

- **Mitigation Measure NOISE-A:** Stationary noise sources associated with future non-residential uses (e.g., mechanical equipment and loading docks) within the project areas shall not have a direct line-of-sight to noise sensitive uses. The line-of-sight between the noise source and noise sensitive receptor shall be blocked through the orientation of the non-residential land use and/or by using noise barriers, such as a concrete block wall or enclosing the noise source.

A portion of the Planning Area is located along the Gold Line light rail service tracks. Future development projects proposed pursuant to the General Plan would be required to prepare project-specific noise analyses to ensure that interior noise levels meet HUD and City standards. Compliance with existing regulations would ensure a less than significant impact.

The City regulates noise associated with construction activities through the enforcement of noise ordinance standards (e.g., days of the week and hours of operation). Strict enforcement of the City Noise Ordinance and other applicable regulations and limitation of construction hours would reduce any construction noise levels. However, implementation of General Plan EIR Mitigation Measures NOISE-C through NOISE-F are required to reduce construction noise to a less than significant at the programmatic level. Future development projects would be required to determine the project-specific vibration levels and mitigation measures would be applied, as necessary, to reduce impacts.

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

To ensure that noise producers do not adversely affect sensitive receptors, the City of Monrovia identifies land use compatibility standards within the General Plan to use for planning and development decisions. The General Plan Noise Element includes policies, standards, criteria, programs, diagrams, and maps related to protecting public health and welfare from excessive noise exposure. General Plan Goals and Policies together with Municipal Code standards for noise control are incorporated into the land use planning process to reduce noise and land use incompatibilities.

Future development projects associated with implementation of the proposed Project are subject to the policies of the General Plan designed to minimize noise impacts to noise-sensitive properties as well as to the City’s Noise Ordinance. Noise studies area required as part of the environmental review process for housing developments, and these studies would evaluate noise levels and incorporate design features or mitigation measures necessary to minimize adverse noise impacts.

The proposed Project does not include changes to the land use or zoning designations of any parcel within the City; thus, impacts associated with future development projects would remain within the scope of analysis in the General Plan EIR. Future development projects would be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues would be vetted and appropriate project-level mitigation incorporated, if needed. Impacts would be less than significant with implementation of existing policies,

standards, regulations, and compliance with General Plan EIR Mitigation Measures NOISE-A and NOISE-C through NOISE F. No additional mitigation is required.

**B) Less Than Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second, and in the U.S. is referenced as vibration decibels (VdB). The background vibration velocity level in residential and educational areas is usually around 50 VdB while the vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors cause most perceptible indoor vibration. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is the general threshold where minor damage can occur in fragile or historic buildings.

As described in the General Plan EIR, residential uses located within the Planning Area would experience construction-related vibration levels that would not exceed the potential building damage threshold of 0.5 PPV. However, vibration levels would occasionally exceed the annoyance threshold of 80 RMS when construction occurs in adjacent areas. Ground-borne vibration attenuates quickly with distance and the RMS level from heavy equipment would be approximately 79 RMS at 60 feet. Construction activity associated with future development pursuant to the General Plan would be required to comply with the standards established in the Noise Ordinance. As such, vibration impacts would be less than significant at the programmatic level. Future development projects would be required to determine the project-specific vibration levels and mitigation measures would be applied, as necessary, to reduce impacts.

Rail activity associated with the Gold Line generates groundborne vibration. The Metro Gold Line Draft EIS/Draft EIR comprehensively analyzed future groundborne levels at existing sensitive receptors. The Draft EIS/Draft EIR concluded that rail vibration would exceed the FTA residential vibration threshold of 72 VdB at residential land uses located within 240 feet of the rail line. Rail activity would expose new sensitive receptors to incompatible vibration levels. The impact would be significant. As such, the City would require the receptor-based mitigation measure (General Plan EIR Mitigation Measure NOISE-B) to reduce vibration-related impacts to less than significant.

- **Mitigation Measure NOISE-B:** Project-specific vibration studies shall be prepared prior to the approval of residential land uses within 300 feet of the Gold Line rail tracks. The studies shall quantify vibration levels based on measurements of existing light rail activity, vibration propagation tests of the soil at project sites, and Gold Line travel speed. If necessary, the studies shall include mitigation to reduce vibration levels at proposed residential land uses to below the 72 VdB FTA significance threshold. Mitigation measures may include, but are not limited to, supporting the building foundation on elastomer pads similar to bridge bearing pads.

With regard to railroad operations, noise and vibration impacts would be evaluated on a project-by-project basis pursuant to CEQA and the City's local implementation procedures, and project-specific mitigation measures would be required, if necessary.

No short- or long-term impacts would be associated with vibration at a programmatic level for the proposed Project as no policy changes, developments, or infrastructure improvements are proposed. Impacts would be less than significant with compliance with General Plan EIR Mitigation Measure NOISE-B..

**C) No Impact.** The closest airport to the City of Monrovia is the San Gabriel Valley Airport. The City does not fall within the Airport Influence Area for the airport. While the City does include land that is within two miles of the airport, the Inventory Sites identified in the Housing Element Update are more than two miles from the airport. The proposed Project would not result in a safety hazard or excessive noise. this impact would be less than significant, and no mitigation is required..

## 14. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**A) No Impact.** Population growth is a complex interaction of immigration, emigration, births, deaths, land use, and economic factors of which the General Plan and Housing Element are only a part. Regional models of population growth and change, accounting for these complexities, are developed by the California Department of Housing and Community Development (HCD) and the Southern California Association of Government (SCAG).

The Housing Element Update is designed to guide and accommodate the City's share of the projected regional population growth and associated housing over the next eight years. Pursuant to Government Code 65584, HCD is required to determine the Regional Housing Needs Allocation (RHNA), by income category, for Council of Governments (COGs) throughout the State. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category.

The Housing Element is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the SCAG. For the 2021-2029 planning period, the City of Monrovia RHNA is 1,670 housing units. The Housing Element Update identifies adequate land and planning mechanisms to accommodate the future housing needs of the growing population derived directly from the population growth estimates for the region, so the proposed Project would not induce unplanned population growth. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. No impact would occur, and no mitigation is required.

**B) No Impact.** The proposed Project is intended encourage and facilitate housing development and preserve and enhance existing housing stock. Redevelopment within the City would not result in a net loss of housing units because such redevelopment would result in the development of new housing units. Thus, the availability of residential units in response to increases in population is supported by the Housing Element Update. Considering residential units would increase naturally as guided by the goals and policies of the Housing Element Update, no impacts related to the displacement of housing or people would occur, and no mitigation is required.

## 15. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** Monrovia Fire and Rescue (Fire Department) provides fire and emergency response to the City of Monrovia. In 2019, the Fire Department responded to 4,600 emergency calls for service with approximately 80 percent requiring paramedic care. The Fire Department has a budget of \$11.6 million, 52 personnel, and two fire stations.

The Fire Department responds to fires, floods, medical emergencies, hazardous materials releases, extrication incidents and other rescue calls while also providing non-emergency public assistance. Functions performed by the Fire Department include fire prevention, fire suppression, pre-hospital emergency medical care, pre-fire planning, training, apparatus maintenance and communications support. The Fire Department is also responsible for the development and maintenance of a citywide disaster plan and Emergency Operations Center (EOC) that would coordinate the Local, State and Federal resources necessary to manage disasters impacting Monrovia.

As described in the General Plan EIR, individual development projects are subject to standard pre-development review by several City departments, including the Fire Department. This review process ensures that the necessary and appropriate ingress/egress points, fire protection systems such as alarms and automatic sprinklers, and minimum fire flow requirements are incorporated into all project plans. The City would continue to enforce access standards for adequate turning radii, Class A roofing standards for fire resistive construction, fire management plans for projects within areas subject to wildland fires, and weed abatement programs in high fire risk areas.

Furthermore, the Safety Element Update includes the following proposed policies and actions related to fire protection and emergency services:

- Policy 3.1.1: Continue to plan for new construction and redevelopment that decreases the likelihood of fire and decreases tie impacts of fire damage.
  - Action 3.1.1.1: Require development to provide adequate defensible space to minimize the risk of structural damage associated with wildland fires
  - Action 3.1.1.2: Require new development to be located in areas with adequate water supply and water supply infrastructure.
  - Action 3.1.1.3: Continue to implement the California Building and California Fire Codes, as well as the following policies and standards for hillside development:

- Fire suppression access to natural chaparral areas shall be provided and maintained.
- Landscape materials for the coverage and stabilization of graded slopes shall be selected to be compatible with surrounding natural vegetation and shall recognize climatic, soil, exposure, and ecological characteristics of the site. Plant materials that require substantial water after becoming established shall be avoided. Native dry climate grasses and other materials shall be selected wherever feasible. (Fire Department approval required).
- Cantilevered construction, including stairs, balconies, porches, open structure under buildings shall be fire retardant construction and shall be protected by fire sprinklers, when applicable, which have been reviewed and approved by the Fire Department.
- Eaves shall be fully boxed in with exterior stucco or its equivalent. Vents shall be covered with one-sixteenth inch mesh or its equivalent.
- New roofs shall be class "All non-flammable materials."
- Flammable chaparral, excluding mature trees, on a lot within 200 feet of a home, shall be cleared, maintained, and replaced with vegetation to minimize fire hazard.
- Fire hydrants shall be provided and located within 300 feet of structures except where a greater distance is allowed by the Fire Chief in conjunction with the installation of automatic fire sprinklers. All water main installations will be "looped" with no dead-end main allowed.
- To provide adequate Fire Department access, foothill neighborhoods shall be linked with a continuous circulation system. Segments of that system may consist of emergency access roads.
- Action 3.1.1.4: Continue to enforce the following ordinances promoting fire prevention.
  - Enforce installation of fire alarm systems and or sprinklers to provide protection to life and property.
  - Enforce regulations requiring smoke detectors in all structures.
  - Enforce installation of chimney spark arrestors.
  - Prohibit the use of flammable roofing materials.
  - Continue to adopt, implement, and require new structures to incorporate latest California Building Code, California Fire Code (including a minimum of 40-foot right-of-way and a grade less than six percent to ensure adequate access for fire emergencies), Government Code sections 51175 and 51189 related to VHFSZ, and Board of Forestry and Fire Protection Fire Safe Regulations, among others.
  - To prevent life hazard and to protect the hillsides and residential, industrial, and commercial areas, enforce ban on use of all fireworks.
- Action 3.1.1.5: Control hazardous or potentially dangerous operations or land uses.
  - Require a conditional use permit for industrial operations involving the compounding of radioactive materials, petroleum refining, manufacturing of explosives, or any other operation of a dangerous nature.
  - Enforce ordinances prohibiting the igniting or burning of flammable materials on public or private property.
  - Restrict and regulate devices or equipment that could create fire, explosion, or bodily injury.
  - Restrict storage of flammable liquids and explosives to manufacturing zones.



- Action 3.1.1.6: Update zoning and/or building code to require residential and nonresidential structures have street numbers (and street name, as appropriate) visible from public and private roadways and alleys.
- Action 3.1.1.7: Identify all development that does not comply with current fire safety standards, in terms of road standards and vegetative hazard; establish and implement a mitigation plan to remedy the noncompliance.
- Action 3.1.1.8: Consider relocating and work with other agencies to facilitate the relocation of essential public facilities out of the high-risk, wildfire prone areas.
- Action 3.1.1.9: Avoid, if possible, or minimize new residential development in the VHFSZ.
- Action 3.1.1.10: Ensure that infrastructure located within VHFSZ has the capacity to support emergency services and operations.
- Action 3.1.1.11: Require all new essential public facilities be sited outside of the VHFSZ, when feasible.
- Action 3.1.1.12: Require new development within the VHFSZ provide a pre-plan, which includes:
  - location and direction of evacuation routes,
  - at least two points of ingress and egress,
  - maintenance of defensible space clearances around structures and subdivisions,
  - provision and maintenance of fuel breaks, and
  - provision and maintenance of roadside fuel reduction plan to prevent fires along public roads, and
  - a fire resistive vegetation landscape plan
- Action 3.1.1.13: Require all new and redevelopment occurring within the VHFSZ be designed, constructed, and maintained in accordance with the latest building and fire codes.
- Action 3.1.1.14: Ensure new and existing development located within the Very High Fire Severity Zone (VHFSZ) is designed to implement fire prevention measures.
- Action 3.1.1.15: Develop outreach programs that educate residents regarding:
  - evacuation routes and wildfire evacuations,
  - defensible space,
  - fire hazard impacts, such as structural damage, wildfire smoke, etc.,
  - fire prevention measures, and
  - structural hardening.
- Policy 3.1.2: Continue to allow structures and infrastructures located in the VHFSZ to be rebuilt or redeveloped, after a large fire, in accordance with the Building and Fire Codes in place at the time of the rebuilding.
  - Action 3.1.2.1: Periodically, consider amending the City's VHFSZ Rebuilding policy to ensure it reflects community vision and best practices.
- Policy 3.1.3: Ensure Monrovia's water supply and distribution system is adequate and appropriate to facilitate fire suppression.
  - Action 3.1.3.1: Develop and implement a plan to ensure the maintenance and long-term integrity of water supply and its supply infrastructure.

- Action 3.1.3.2: Regularly assess the water supply systems for development are adequate to combat structural and wildland fires.
- Action 3.1.3.3: Ensure or install fire protection water systems for all new construction projects in the VHFSZ, including the installation of fire hydrants providing adequate water flow, fire sprinklers or suppression systems.
- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City's Evacuation Plan to identify the evacuation routes' capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
  - Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
  - Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.
- Policy 3.1.5: Continue to support and implement fuel management programs.
  - Action 3.1.5.1 Maintain or require the maintenance of fire hazard reduction projects, including but not limited to community fire breaks, private road clearance, and public road clearance.
  - Action 3.1.5.2: Regularly assess the effectiveness, and modify as appropriate, the City's SAFE Landscaping materials and Community Wildfire Protection Plan.
- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.
  - Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
  - Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
  - Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
  - Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
  - Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

Future development projects associated with implementation of the proposed Project, which would be consistent with the development evaluated within the General Plan EIR, would result in the incremental increase in need for fire protection services as the City's population grows and the number of residential units increases. The General Plan EIR noted that while the number of calls for fire protection services would increase, the City does not anticipate a decrease in response times or the need to construct new or expanded fire stations. The impact would be less than significant, and no mitigation is required.

**B) Less Than Significant Impact.** The Monrovia Police Department provides police protection services within the City. The Police Department headquarters building is located at 140 East Lime Avenue. The City of Monrovia Police Department has 80 full-time police personnel and a budget of \$13 million.

Future development projects associated with implementation of the proposed Project, which would be consistent with the development evaluated within the General Plan EIR, would result in the incremental increase in need for police services as the City's population grows and the number of residential units increases. The General Plan EIR noted that while the number of calls for police services would increase, the City does not anticipate a decrease in response times or the need to construct new or expanded police stations. The impact would be less than significant, and no mitigation is required.

**C) Less Than Significant Impact.** The Monrovia Unified School District (MUSD) provides public school services within the City. MUSD operates 12 schools, which also includes an early learning center and an adult school. In the 2020-2021 school year, the District had an enrollment of 5,247 student.

Future development projects associated with implementation of the proposed Project could generate additional students that would exceed the capacity of school facilities resulting in the need for additional school facilities to maintain acceptable service ratios. Payment of school impact fees, as allowed by Government Code 65996, are meant to offset increased student enrollment and has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities. Any specific school facility developments would be subject to environmental review on a project-by-project basis. Through the payment of associated development fees and compliance with applicable State and local regulations, the proposed Project would have a less than significant impact on school facilities, and no mitigation is required.

**D) Less Than Significant Impact with Mitigation Incorporated.** Monrovia provides and maintains a growing system of parks that supports a range of active and passive experiences. The park and open space inventory identifies the recreational assets within Monrovia. The City provides over 33 acres of urban parks and an additional 80 acres of natural area distributed among nine park sites.

As described in the General Plan EIR, the increased population at General Plan buildout would reduce the City's parkland ratio from 3.14 acres of parkland per 1,000 residents to 2.1 acres of parkland per 1,000 residents, assuming no additional park space is added. Applying the National Recreation and Parks Service parkland standard of 3 acres of parkland per 1,000 residents indicates that the City would have a net deficit of 49 acres of parkland. As such, future development projects would result in increased use of existing neighborhood and regional parks, other recreational facilities, and trails that may cause or accelerate substantial physical deterioration. The impact would be potentially significant; thus, General Plan EIR Mitigation Measures PS-A and PS-B would be applicable to ensure impacts remain at less than significant.

- **Mitigation Measure PS-A:** The City shall identify potential sites for additional parkland, monitor demand for parkland and recreational facilities concurrent with development approvals, and prioritize potential parkland acquisitions, expansions, and improvements within its Capital Improvement Program.
- **Mitigation Measure PS-B:** The City shall require developers of projects greater than 200 residential units to dedicate land based on the standard of 3 acres per 1,000 residents.

Future development projects associated with implementation of the proposed Project would generate new or relocated residents that would increase the demand for park and recreation facilities and associated programs, either through expansion of existing facilities or construction of new facilities. As described in page 3.9-11 the General Plan EIR, future development projects would be required to dedicate parkland in accordance with City standard or pay in-lieu fees. To contribute to parkland acquisition, consistent with Quimby Act regulations, Monrovia's dwelling unit tax (Monrovia Municipal Code Title 3, Chapter 3.32) may be collected to satisfy park provision requirements. The City's dwelling unit tax is determined at the time of the issuance of the building permits and all proceeds from the tax collected shall be paid into the Project Resource Fund. The Project Resource Fund is used by the City for the purposes of municipal projects, which can include purchasing land or

improving and expanding public parks and recreational facilities. All residential projects are required to pay the dwelling unit tax.

The City would continue to require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand. However, if projects with greater than 200 residential units are unable to dedicate land based on the standard identified in General Plan EIR Mitigation Measure PS-B, the project could result in a potentially significant public services impact with respect to parks. The following mitigation measure would reduce this potential impact to a less than significant level:

**Mitigation Measure PS-1:** The City shall require developers of projects greater than 200 residential units to implement one of the following measures:

- a. The project applicant shall dedicate land based on the standard of 3 acres per 1,000 residents, consistent with General Plan EIR Mitigation Measure PS-B; or
- b. The project applicant shall pay an in lieu parkland fee equivalent to the value of the land that would otherwise be required under measure “a” above, as determined and approved by the City.

Construction and operation of new or expanded parks and recreation facilities would be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. Impacts would be less than significant with implementation of existing regulations and General Plan EIR Mitigation Measures PS-A and PS-B and project Mitigation Measure PS-1.

**E) Less Than Significant Impact.** Future development projects associated with implementation of the proposed Project would generate an incremental increase in demand for a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, senior centers, and other facilities. Construction and operation of new or expanded public service facilities would be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all project-level environmental issues would be vetted and appropriate mitigation incorporated, if needed. Impacts would be less than significant with implementation of existing regulations; no mitigation is required.

**16. RECREATION**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**A) Less Than Significant Impact with Mitigation Incorporated.** Please see Section 15.D and 15.E for a discussion of impacts to parks and recreation facilities.

**B) No Impact.** The proposed Project does not include the construction or expansion of recreational facilities in the City. Construction and operation of new or expanded parks and recreation facilities would be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. No impacts would occur, and no mitigation is required.

## 17. TRANSPORTATION AND TRAFFIC

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less than Significant Impact.** The City is served by local transportation facilities including streets, freight railways, light rail, and bus routes in addition to non-motorized transportation facilities such as sidewalks, trails, and bikeways. These facilities provide options for travel modes that include passenger vehicles, trains, buses, bikes, and walking. These facilities and modes of travel comprise the circulation system for the City, and the broader system, designed with the goals of efficiently moving people and goods throughout the region by providing ease of access to multiple modes of travel.

**Road.** The City's street system is primarily a grid with streets running north-south and east-west. The primary north-south roadways are South Myrtle Avenue, Mayflower Avenue and Mountain Avenue. The primary east-west roadways are East Foothill Boulevard, Huntington Drive, and Duarte Road.

Principal regional access to the City is provided by the I-210 (Foothill) Freeway that runs east-west through the City. A full interchange is located near the western edge of the City at Huntington Drive. Full interchanges are also located at Myrtle Avenue and at Mountain Avenue and are connected by the one-way frontage roads of Evergreen Avenue and Central Avenue. Interstate 605 (I-605) is a north-south freeway approximately 1.5 miles east of the City. This freeway runs between the northeastern San Gabriel Valley (Duarte) and Long Beach in southeast Los Angeles County. The segment of I-605 closest to Monrovia has four lanes in each direction.

**Transit.** The public transportation system in Monrovia provides some non-auto options for commute and recreational travel, with connections to regional cities and destinations. The City of Monrovia is served by bus and light rail. The following agencies provide local and regional connectivity, providing an alternative to driving a personal vehicle:

- **Foothill Gold Line (light rail).** The Foothill Gold Line is a light rail service that runs from Pasadena to Azusa. The Monrovia Station is located northwest of the intersection of Duarte Road and Myrtle Avenue.
- **Foothill Transit (bus).** The service includes two bus transit lines: Route 187 (Azusa - Arcadia – Pasadena) and Route 270 (El Monte - Irwindale – Monrovia).
- **Metropolitan Transportation Authority (METRO).** This service includes one bus transit line: Route 264 (Altadena – Duarte)

**Bicycle Routes.** Minimal dedicated bicycle facilities are currently provided in the City.

**Pedestrian Facilities.** Sidewalks are located throughout City, as well as pedestrian crossings at controlled intersections and uncontrolled intersections, and several midblock crossings. Many of the City's sidewalks are landscaped, provide public seating, and are ADA compliant and include compliant curb ramps.

**SCAG Plans.** Two planning efforts guide the long-term improvement of the circulation system at the regional and local levels. The Regional Transportation Plan (RTP) and Sustainable Communities Strategy (RTP/SCS), which were last updated in September 2020 (Connect SoCal) and are administered by the Southern California Association of Governments (SCAG) to meet the needs of travel and goods movement through the year 2045.

**Congestion Management Plan.** Urbanized areas within the state of California, such as Los Angeles County, are required to adopt a Congestion Management Program (CMP). The goals of the CMP are to reduce traffic congestion and to provide a mechanism for coordinating land use development and transportation improvement decisions. Los Angeles County compiles the data and submits the results to the Southern California Association of Governments (SCAG) for a finding of regional consistency. The I-210 freeway is a roadway component of the Congestion Management Plan system. The Los Angeles County Congestion Management Program (CMP) is administered by the Los Angeles County Metropolitan Transportation Authority. The CMP addresses congestion management through a process developed cooperatively throughout the metropolitan region that provides for safe and effective management and operation of existing and future transportation facilities through demand reduction and operations strategies.

While the RTP/SCS addresses the broader goals of the transportation network, the CMP focuses on specific, regional facilities requiring funding for maintenance and improvements in order to meet the goals of the RTP/SCS. The CMP relies on local jurisdiction standards in determining the performance of the CMP network. The final effort is the City's General Plan Circulation Element that identifies long-term transportation improvements for local facilities. The General Plan includes goals and policies aimed to provide an efficient multi-modal circulation system in the city. General Plan policies also encourage the development of an efficient and safe bikeway and public transportation system. The City of Monrovia has defined LOS D as its minimum acceptable peak hour roadway performance standard except at locations where LOS F conditions currently exist.

These local and regional planning efforts are designed to reduce the direct and indirect effects of travel so as to minimize or avoid resulting impacts on human health and the environment. The Housing Element Update includes the City's RHNA identified by SCAG and is consistent with the growth assumptions used in the development of the RTP/SCS and CMP and does not include any land use changes to the General Plan; therefore, the Housing Element Update would not conflict with the goals or transportation planning efforts of the City or SCAG. Furthermore, according to the General Plan EIR, implementation of General Plan policies would avoid or reduce impacts of General Plan build out on the performance of the roadway system to less than significant.

Future development projects associated with implementation of the proposed Project would not impede local or regional efforts to ensure an efficient circulation system. Future housing development would be subject to preliminary environmental review pursuant to CEQA, and if found not to be exempt, subject to full environmental analysis at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed, should transportation impacts be identified that are not covered under existing or future development impact fees. Impacts would be less than significant with implementation of existing standards and regulations, and no mitigation is required.

**B) Less Than Significant Impact.** In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous CEQA metric of level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, would no longer constitute a significant environmental impact.

Implementation of the proposed Project would result in the future development projects in the City, although the anticipated growth would be within the limits identified in the General Plan and General Plan EIR. Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric. The General Plan EIR identified roadway and freeway segment LOS impacts and Mitigation Measure TRANS-1 was identified to reduce this impact, but not to less than significant; this impact was considered significant and unavoidable, and the City adopted a Statement of Overriding Consideration. The proposed Project is consistent with the analysis in the General Plan EIR because land use and zoning designations are unchanged, and VMT under the General Plan EIR and the proposed Project would be similar. Development associated with implementation of the proposed Project would not result in a new significant impact. Furthermore, no substantial increase in the severity of previously identified impacts associated with the proposed Project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened.

**C) No Impact.** The proposed Project does not include the construction of any roadway and would result in no effects on the design of existing or future streets. Therefore, it would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). There would be no impact and no mitigation is required.

**D) Less Than Significant Impact.** The proposed Project does not involve any road construction or any development activity and thus would not obstruct or restrict emergency access to or through the City. The Safety Element Update includes the following proposed policies and actions regarding emergency access:

- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City's Evacuation Plan to identify the evacuation routes' capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
  - Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
  - Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.
- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.
  - Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
  - Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
  - Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
  - Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
  - Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

Future development projects associated with implementation of the proposed Project would be subject to site plan review and approval during entitlement review and/or application for building permits. The Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Impacts involving emergency access would be less than significant with continued implementation of development review procedures. Therefore, impacts would be less than significant, and no mitigation is required.



**18. TRIBAL CULTURAL RESOURCES**

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

**A) Less than Significant Impact.** As described in the General Plan EIR, there are no archaeological sites known to exist within the City. Nevertheless, unknown archaeological sites may be unearthed during excavation and grading activities for specific projects, including projects associated with implementation of the proposed Project. The Inventory Sites identified in the Housing Element Update are located in urban development areas, and infill development in already developed area is not anticipated to result in the uncovering of additional resources. However, deep excavations for parking facilities could unearth artifacts. Development of previously undeveloped sites, such as those located in the foothills, could disturb artifacts given the former presence of indigenous people in the region.

Prior discoveries of archaeological resources in the region have been limited to projects located within two sensitive geologic formations: Topanga Formation and Late Miocene Marine Monterey Formation. Although, based on the General Plan EIR, the potential for discovery of new resources has not been ruled out by the City. Therefore, potential impacts were determined to be significant in the General Plan EIR with mitigation. Implementation of General Plan EIR Mitigation Measure CUL-A for future development projects was determined to reduce the impact to less than significant.

- **Mitigation Measure CUL-A:** Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional.

With the continued implementation of Mitigation Measure CUL-A potential impacts of the proposed Project would be less than significant. The significance of impacts to archaeological resources resulting from future development projects would be evaluated on a project-by-project basis. Individual development projects could result in significant impacts to archaeological and paleontological resources if they would result in potential impacts that were not evaluated in the General Plan EIR. If project-level impacts are identified, specific mitigation measures would be required per CEQA.

In addition, two state laws (SB 18 and AB 52) require the City to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. On May 27, 2021, the City sent letters notifying the following of the opportunity for tribal consultation: Gabrielino-Tongva Tribe; Soboba Band of Luiseno Indians; Gabrieleno/Tongva Nation; San Manuel Band of Mission Indians; Gabrielino Tongva Indians of California Tribal Council; Gabrieleno/Tonhva San Gabriel Band of Mission Indians; Gabrieleno Band of Mission Indians-Kizh Nation; and the Santa Rosa Band of Cahuilla Indians. No requests for consultation under either AB52 or SB18 for the proposed Project have been made by a Native American tribe with geographic or traditional connection to the area of land in which the City of Monrovia is located.

The General Plan EIR concluded that build out of the General Plan would result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources with implementation of General Plan EIR Mitigation Measure CUL-A. The proposed Project does not include any land use changes or changes to zoning designations on properties. Therefore, long-term impacts in the City have already been contemplated General Plan EIR, and the proposed Project would not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development projects would be subject to the goals and policies of the General Plan and would be subject to review in compliance with CEQA requirements. Impacts would be less than significant, and no mitigation is required.

**B) Less than Significant Impact.** Similar to potential impacts resulting from the effects of future development projects on historical resources, impacts to archaeological resources can result in the loss of information important to the history (and potentially the pre-history) of California and the people who created and/or used the materials. The potential for uncovering significant resources at Inventory Site locations during construction activities is unknown given that no such resources have been discovered and/or recorded previously.

Two changes to state law (SB 18 and AB 52) require cities to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. As described in detail in Section 18.A, no requests for consultation under either AB52 or SB18 for the proposed Project have been made by a Native American tribe with geographic or traditional connection to the area of land in which the City of Monrovia is located.

The General Plan EIR concluded that build out of the General Plan would result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources with implementation of General Plan EIR Mitigation Measure CUL-A. Therefore, long-term impacts in the City have already been contemplated in the General Plan EIR, and the proposed Project would not result in impacts that are greater such impacts. In addition, future development projects would be subject Mitigation Measure CUL A and the goals and policies of the General Plan, and would be subject to review of applicable CEQA requirements. Impacts would be less than significant, and no additional mitigation is required.

## 19. UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less than Significant Impact.** The City of Monrovia is the retail supplier of water for the City. The San Gabriel Ground Water Basin, which is administered by the Upper San Gabriel Valley Municipal Water District (Upper District), is the City's groundwater source. The City of Monrovia delivers potable water supplies through its pressurized distribution system, which consists of approximately 111 miles of piping.

The local wastewater collection system is owned and operated by the City. The City's location in the foothills allows the sewer system to operate primarily via gravity flow. The City, through its Public Works Department, owns, operates, and maintains a sanitary sewer collection system including approximately 92 miles of City sewers with sewer pipe sizes varying in diameters from 6 inches to 24 inches. Wastewater generated in Monrovia is carried by the local pipe system to trunk sewers operated by the County Sanitation Districts of Los Angeles County (Sanitation Districts). The City also operates and maintains storm drains within its boundaries.

Southern California Edison provides electricity to the City. The Southern California Gas Company (SoCalGas) provides natural gas service to the City. SoCalGas is the principal distributor of natural gas in Southern California and provides natural gas for residential, commercial, and industrial markets.

Future development projects associated with implementation of the proposed Project would consume water, electricity, and natural gas while producing wastewater for conveyance and treatment. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Future development projects on Inventory Sites included in the Housing Element Update would fall within the development levels evaluated within the General Plan EIR and is consistent with growth anticipated in the General Plan. Utility agencies and companies develop master service plans based on anticipated land uses outlined in the General Plans of the various jurisdictions they serve; these master plans have already taken into account the growth anticipated under the Housing Element Update, which is consistent with the growth that is anticipated in the General Plan and the General Plan EIR. In addition, future development projects are required to assure adequate utility service during the development review and CEQA process. Therefore, utility impacts associated with the proposed Project are consistent with those previously analyzed in the General Plan EIR. This impact would be less than significant, and no mitigation is required.

**B) Less than Significant Impact.** The City of Monrovia is a retail water supplier that serves the majority of the residents within the City of Monrovia. The City's water supply sources include groundwater pumped from the Main Basin and treated, imported surface water purchased from Metropolitan Water District of Southern California through Upper District.

As a water supplier, the City is required to prepare and Urban Water Management Plan (UWMP). An UWMP provides a framework for long term water supply and evaluates existing water conservation efforts. As described in the City's UWMP, purchased water and groundwater supplies are sufficient in meeting the City's historical water demands under all base years, including during normal, single, and multiple dry years. During drought situations, the cost of water supplies may increase based on the mix of supplies which are used. Consequently, the City has a Water Shortage Contingency Plan to balance water demands with available supplies.

The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. As described in the General Plan EIR, new development would be required to undergo pre-development review to determine if sufficient water supply infrastructure exists to support new development. Individual development projects would be required to pay connection fees for new water supply hook-ups. Further, if the City determines the supply infrastructure to be undersized to support the proposed new development, the developer would be required to pay the City to upgrade the system. In this way the City would ensure that water supply infrastructure is not adversely impacted by new development. Additionally, in adherence with SB 610, any new development project subject to CEQA that meets specific development specifications, such as residential development with over 500 dwelling units, would need to complete Water Supply Assessment (WSA).

Future development growth associated with implementation of the proposed Project would be consistent with the growth identified in the General Plan and evaluated in the General Plan EIR. The potential impact to water supplies would be less than significant and no mitigation is required.

**C) Less than Significant Impact.** The City owns, operates, and maintains the local sewer lines that collect wastewater generated within the City, which includes approximately 92 miles of City sewers with pipelines varying from 6 inches to 24 inches in diameter. Wastewater collected in the City's trunk sewer lines flows south to the Los Angeles County Sanitation District (LACSD) wastewater treatment facilities.

Wastewater generated in Monrovia is carried by the local pipe system to trunk sewers operated by the County Sanitation Districts of Los Angeles County (Sanitation Districts). The Sanitation Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. As described in the General Plan EIR, the design capacities of the Sanitation Districts' wastewater treatment facilities are based on the regional growth forecast adopted by SCAG. All expansions of the Sanitation Districts' facilities must be sized and service phased in a manner which is consistent with the SCAG regional growth forecast. The available capacities of the Sanitation Districts' facilities would therefore be limited to levels associated with the approved growth identified by SCAG.

Future development projects associated with implementation of the proposed Project would generate additional wastewater for conveyance and treatment. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Accordingly, growth associated with implementation of the proposed Project is consistent with the General Plan growth projections which were evaluated in the General Plan EIR. In addition, future development projects are required to assure adequate wastewater service during the development review and CEQA process. Therefore, there would be no new wastewater treatment impacts that have not already been analyzed in the General Plan EIR. The impact would be less than significant, and no mitigation is required.

**D) Less than Significant Impact.** All solid waste generated within the City of Monrovia is collected by Athens Services. As described in the General Plan EIR, all of the solid waste collected in the City is transferred to one of the following landfills: Bakersfield Metropolitan (BENA) Sanitary Landfill, Chiquita Canyon Sanitary Landfill, El Sobrante Landfill, Fontana Reuse Disposal Site, Frank R. Bowerman Sanitary Landfill, Olinda Alpha Sanitary Landfill, Puente Hills Landfill No. 6, Simi Valley Landfill – Recycling Center, Sunshine Canyon Sanitary Landfill County Extension, Sunshine Canyon/North Valley Landfill, and Waste Management of Lancaster Sanitary Landfill. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Future development projects associated with implementation of the proposed Project would be required to comply with established solid waste regulations and procedures. This impact would be less than significant, no mitigation is required.

**E) Less than Significant Impact.** The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. All new development would be required to comply with State mandates and City regulations regarding reduction/recycling of household waste. None of the housing strategies in the Housing Element Update would have any effect upon or result in any conflicts with solid waste disposal regulations, as the scope of these revisions does not increase development capacity. The impact would be less than significant, and no mitigation is required.

## 20. WILDFIRE

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** The City’s Emergency Operations Center coordinates disaster response and recovery efforts in the City of Monrovia. The Fire Department, which is responsible for the development and maintenance of a citywide disaster plan and Emergency Operations Center (EOC), coordinates with Local, State and Federal resources necessary to manage disasters impacting Monrovia. The City is part of a county and statewide emergency management system that addresses evacuation and movement of people in the event of an emergency.

The Project does not propose or approve any road construction or any site-specific development activity, and thus would not obstruct or restrict emergency access to or through the City. The Safety Element Update does include the following proposed policies regarding emergency access:

- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City’s Evacuation Plan to identify the evacuation routes’ capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
  - Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
  - Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.

- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.
  - Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
  - Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
  - Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
  - Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
  - Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Future development projects would be subject to site plan review and approval during entitlement review and/or application for building permits. The City Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Impacts would be less than significant with continued implementation of development review procedures, and no mitigation is required.

**B) Less Than Significant Impact.** As noted by CALFIRE Fire Hazard Severity Zone Maps, portions of the City are located in an areas identified as very high hazard severity zones. These high hazard severity zones are generally areas that are, or adjacent to, undeveloped wildland areas. Portions of the City are identified as being under both local responsibility and state or federal responsibility.

The Safety Element Update includes several proposed goals, objectives, policies, and actions to reduce fire hazards, including:

**Goal 3:** Reduce the risk of fire and minimize consequences from fire events in Monrovia.

- Policy 3.1.1: Continue to plan for new construction and redevelopment that decreases the likelihood of fire and decreases tie impacts of fire damage.
  - Action 3.1.1.1: Require development to provide adequate defensible space to minimize the risk of structural damage associated with wildland fires
  - Action 3.1.1.2: Require new development to be located in areas with adequate water supply and water supply infrastructure.
  - Action 3.1.1.3: Continue to implement the California Building and California Fire Codes, as well as the following policies and standards for hillside development:
    - Fire suppression access to natural chaparral areas shall be provided and maintained.
    - Landscape materials for the coverage and stabilization of graded slopes shall be selected to be compatible with surrounding natural vegetation and shall recognize climatic, soil, exposure, and ecological characteristics of the site. Plant materials that require substantial water after becoming established shall be avoided. Native dry climate grasses and other materials shall be selected wherever feasible. (Fire Department approval required).
    - Cantilevered construction, including stairs, balconies, porches, open structure under buildings shall be fire retardant construction and shall be protected by fire sprinklers, when applicable, which have been reviewed and approved by the Fire Department.

- Eaves shall be fully boxed in with exterior stucco or its equivalent. Vents shall be covered with one-sixteenth inch mesh or its equivalent.
- New roofs shall be class "All non-flammable materials."
- Flammable chaparral, excluding mature trees, on a lot within 200 feet of a home, shall be cleared, maintained, and replaced with vegetation to minimize fire hazard.
- Fire hydrants shall be provided and located within 300 feet of structures except where a greater distance is allowed by the Fire Chief in conjunction with the installation of automatic fire sprinklers. All water main installations will be "looped" with no dead-end main allowed.
- To provide adequate Fire Department access, foothill neighborhoods shall be linked with a continuous circulation system. Segments of that system may consist of emergency access roads.
- Action 3.1.1.4: Continue to enforce the following ordinances promoting fire prevention.
  - Enforce installation of fire alarm systems and or sprinklers to provide protection to life and property.
  - Enforce regulations requiring smoke detectors in all structures.
  - Enforce installation of chimney spark arrestors.
  - Prohibit the use of flammable roofing materials.
  - Continue to adopt, implement, and require new structures to incorporate latest California Building Code, California Fire Code (including a minimum of 40-foot right-of-way and a grade less than six percent to ensure adequate access for fire emergencies), Government Code sections 51175 and 51189 related to VHFSZ, and Board of Forestry and Fire Protection Fire Safe Regulations, among others.
  - To prevent life hazard and to protect the hillsides and residential, industrial, and commercial areas, enforce ban on use of all fireworks.
- Action 3.1.1.5: Control hazardous or potentially dangerous operations or land uses.
  - Require a conditional use permit for industrial operations involving the compounding of radioactive materials, petroleum refining, manufacturing of explosives, or any other operation of a dangerous nature.
  - Enforce ordinances prohibiting the igniting or burning of flammable materials on public or private property.
  - Restrict and regulate devices or equipment that could create fire, explosion, or bodily injury.
  - Restrict storage of flammable liquids and explosives to manufacturing zones.
- Action 3.1.1.6: Update zoning and/or building code to require residential and nonresidential structures have street numbers (and street name, as appropriate) visible from public and private roadways and alleys.
- Action 3.1.1.7: Identify all development that does not comply with current fire safety standards, in terms of road standards and vegetative hazard; establish and implement a mitigation plan to remedy the noncompliance.
- Action 3.1.1.8: Consider relocating and work with other agencies to facilitate the relocation of essential public facilities out of the high-risk, wildfire prone areas.
- Action 3.1.1.9: Avoid, if possible, or minimize new residential development in the VHFSZ.



- Action 3.1.1.10: Ensure that infrastructure located within VHFSZ has the capacity to support emergency services and operations.
- Action 3.1.1.11: Require all new essential public facilities be sited outside of the VHFSZ, when feasible.
- Action 3.1.1.12: Require new development within the VHFSZ provide a pre-plan, which includes:
  - location and direction of evacuation routes,
  - at least two points of ingress and egress,
  - maintenance of defensible space clearances around structures and subdivisions,
  - provision and maintenance of fuel breaks, and
  - provision and maintenance of roadside fuel reduction plan to prevent fires along public roads, and
  - a fire resistive vegetation landscape plan
- Action 3.1.1.13: Require all new and redevelopment occurring within the VHFSZ be designed, constructed, and maintained in accordance with the latest building and fire codes.
- Action 3.1.1.14: Ensure new and existing development located within the Very High Fire Severity Zone (VHFSZ) is designed to implement fire prevention measures.
- Action 3.1.1.15: Develop outreach programs that educate residents regarding:
  - evacuation routes and wildfire evacuations,
  - defensible space,
  - fire hazard impacts, such as structural damage, wildfire smoke, etc.,
  - fire prevention measures, and
  - structural hardening.
- Policy 3.1.2: Continue to allow structures and infrastructures located in the VHFSZ to be rebuilt or redeveloped, after a large fire, in accordance with the Building and Fire Codes in place at the time of the rebuilding.
  - Action 3.1.2.1: Periodically, consider amending the City's VHFSZ Rebuilding policy to ensure it reflects community vision and best practices.
- Policy 3.1.3: Ensure Monrovia's water supply and distribution system is adequate and appropriate to facilitate fire suppression.
  - Action 3.1.3.1: Develop and implement a plan to ensure the maintenance and long-term integrity of water supply and its supply infrastructure.
  - Action 3.1.3.2: Regularly assess the water supply systems for development are adequate to combat structural and wildland fires.
  - Action 3.1.3.3: Ensure or install fire protection water systems for all new construction projects in the VHFSZ, including the installation of fire hydrants providing adequate water flow, fire sprinklers or suppression systems.
- Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.
  - Action 3.1.4.1: Evaluate the City's Evacuation Plan to identify the evacuation routes' capacity, safety, and viability under a range of scenarios. Expand the Evacuation Plan to include all areas of the City, including areas south of Walnut Avenue, Royal Oaks Drive, and Orange Avenue. Once capacities and

- new routes are determined regularly update emergency evacuation plans and routes for the VHFSZ areas.
- Action 3.1.4.2: Conduct a survey of public and private streets to determine those that lack two means of ingress and egress. Identify measures to mitigate the single access issue. Prioritize the planning for and the construction of or the redevelopment of single access roadways within the VHFSZ.
- Action 3.1.4.3: Periodically evaluate access roads to ensure there is sufficient capacity to provide the safe access of emergency equipment and civilian evacuation concurrently.
- Policy 3.1.5: Continue to support and implement fuel management programs.
  - Action 3.1.5.1 Maintain or require the maintenance of fire hazard reduction projects, including but not limited to community fire breaks, private road clearance, and public road clearance.
  - Action 3.1.5.2: Regularly assess the effectiveness, and modify as appropriate, the City's SAFE Landscaping materials and Community Wildfire Protection Plan.
- Policy 3.1.6: Develop and implement fire protection policy and programs including the incorporation of the Monrovia Local Hazard Mitigation Plans.
  - Action 3.1.6.1: Regularly assess that emergency response services (including Fire and Police) are adequate to combat structural and wildland fires and to direct emergency evacuations.
  - Action 3.1.6.2.: Regularly assess the effectiveness, and update as appropriate, the City's MONROVIA RED (Rescue for Elderly and Disabled) REGISTRATION program at identifying and noting the location of Monrovia's at-risk populations.
  - Action 3.1.6.3: Continue to coordinate with cities of Sierra Madre, Arcadia, Azusa, and Duarte; Los Angeles County, and other emergency response agencies to provide for mutual aid in the prevention and response services.
  - Action 3.1.6.4: Regularly assess and project future emergency response needs and create implementation programs and actions to address the identified needs.
  - Action 3.1.6.5: Regularly assess the need for and develop additional fire and police training.

The Inventory Sites identified in the Housing Element Update are not in, or adjacent to, areas identified within a very high hazard severity zone. If housing is proposed within, or adjacent to, areas identified as very high fire hazard severity zones, site-specific analysis with evaluate the specific fire risks at that location. Additionally, the Safety Element Update includes several proposed policies and actions, noted above, to help reduce the risk of structure fire. This impact would be less than significant, and no mitigation is required.

**C. Less than Significant Impact.** No infrastructure construction is included as part of the proposed Project. The proposed Project does identify potential Inventory Sites within the Housing Element Update; all these sites are located in urban parts of the city currently served by existing infrastructure. Thus, future development projects associated with implementation of the proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The impact would be less than significant, and no mitigation is required.

**D. Less Than Significant Impact.** None of the Inventory Sites included in the Housing Element Update are located in a VHFHSZ or located on a significant slope. None of the Inventory Sites are located within or adjacent to a known landslide zone. If future development projects are proposed within, or adjacent to, areas identified as very high fire hazard severity zones, site-specific analysis with evaluate the specific fire risks at that location. Additionally, the Safety Element Update includes several proposed policies and actions, noted above, to help reduce the risk of structure fire and evaluate site-specific geologic conditions. Thus, implementation of the proposed Project would not expose people or structures to significant risks,

including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and no mitigation is required.

## 21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**A) Less Than Significant Impact.** The results of the preceding analysis indicate that the proposed Project would have less-than-significant impacts to sensitive biological, historical, archaeological, and paleontological resources with implementation of the mitigation measures identified in the General Plan EIR. Impacts to scenic vistas and visual character and resources would be less than significant. Considering the programmatic level of analysis would not authorize any development plan, redevelopment of any existing sites, or construction of new infrastructure, and would not change existing City land use policy or zoning designations regarding locations or intensities of development, it would not result in any effects that would degrade the quality of the environment. The City finds that impacts related to degradation of the environment would be less than significant, and no mitigation is required.

**B) Less Than Significant Impact.** Cumulative effects resulting from full implementation of City land use policies were evaluated in the General Plan EIR. The proposed Project does not propose any specific development or redevelopment project that could contribute to short-term or long-term cumulative impacts that were not addressed sufficiently in the General Plan EIR. The proposed Project does not include any changes to land use or zoning designations and thus is consistent with the project analyzed in the General Plan EIR. The City hereby finds that the proposed Project's individual contribution to potentially significant cumulative impacts is not considerable, and no mitigation is required.

**C) Less Than Significant Impact with Mitigation Incorporated.** As supported by the preceding environmental evaluation, the project would not result in substantial adverse effects on human beings. It has been determined through quantitative and qualitative analysis supported by substantial evidence that the proposed Project has been determined to have little or no adverse impacts on people or the environment as evaluated in the 20 preceding environmental topics. The City hereby finds

that direct and indirect impacts on human beings would be less than significant with implementation of the identified mitigation measures.

## 5 LIST OF PREPARERS AND REFERENCES

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415 S. Ivy  
Monrovia, CA 91016

Sheri Bermejo, Planning Division Manager

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**Appendix A:**  
**Response to Public Comments**

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# memo riverside

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to **John Mayer, AICP, City of Monrovia**

Community Development Department  
City of Monrovia  
415 South Ivy Avenue  
Monrovia, CA 91016-2888

from **Bob Prasse and Amy Paulsen, MIG**

re **Response to Public Comments and Text Revisions to the City of Monrovia 2021-2029 Housing Element Update, Safety Element Update, and New Environmental Justice Element Initial Study/Mitigation Negative Declaration**

date **10/06/2022**

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**Public Comments.** The City of Monrovia (City) received the following comment letters during the public review period for the 2021-2029 Housing Element Update, Safety Element Update, and New Environmental Justice Element Initial Study/Mitigation Negative Declaration:

- Letter 1: Miya Edmonson, LDR/CEQA Branch Chief, District 7, Department of Transportation
- Letter 2: Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation
- Letter 3: Mandy Huffman, Environmental Planner, Facilities Planning Department, Los Angeles County Sanitation Districts

These letters were received during the public review period on the IS/MND which closed on October 3, 2022 and are attached in their entirety. Written responses to questions and comments received regarding the environmental analysis within the IS/MND are provided in this memorandum. Please note that text that does not raise environmental issues or relate to the adequacy of the information or analysis within the IS/MND is acknowledge but does not warrant a detailed response.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
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*Making Conservation  
a California Way of Life*

September 28, 2022

John Mayer, Senior Planner  
Community Development Department  
City of Monrovia  
415 South Ivy Avenue  
Monrovia, CA 91016

RE: Monrovia 22021-2029 Housing Element  
Update, Safety Element Update & New  
Environmental Justice Element  
SCH # 2022080729  
Vic. LA-210 Citywide  
GTS # LA-2022-04045-MND

Dear John Mayer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The project includes an update to the City's existing Housing and Safety Elements and a new Environmental Justice Element. The project represents a policy document and does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. The Housing Element updates sets forth the City's plan to accommodate its Regional Housing Needs Assessment (RHNA) allocation of 1,670 new housing units. The project also includes an update to the General Plan's Safety Element to align it with recently enacted State Laws and adopt new climate adaptation and wildfire strategies. Lastly, as part of the project, the City developed a new Environmental Justice Element for the General Plan to comply with Senate Bill (SB 1000) and Senate Bill (SB 244).

The City of Monrovia's RHNA is 1,670 units, broken down by income category as follows:

- Very Low Income (<50% of AMI): 519 units
- Low Income (50 to 80 percent of AMI): 262 units
- Moderate Income (80 to 120 percent of AMI): 254 units
- Above Moderate Income (>120% of AMI): 635 units

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying

transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements for this project or for any future project. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

“Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric. The General Plan EIR identified roadway and freeway segment LOS impacts and Mitigation Measure TRANS-1 was identified to reduce this impact, but not to less than significant; this impact was considered significant and unavoidable, and the City adopted a Statement of Overriding Consideration. The proposed Project is consistent with the analysis in the General Plan EIR because land use and zoning designations are unchanged, and VMT under the General Plan EIR and the proposed Project would be similar.” This “similar Project VMT and VMT threshold should be disclosed to the public in order to determine the significant traffic impact.

In addition to Mitigation Measure TRANS-1 and to reduce any future traffic safety impact on the State facilities, Caltrans recommends the City implement a fee program on the State facilities. We would like to have the opportunity to assist the City to identify any potential safety improvement locations.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04045-MND.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse



Letter 1  
Miya Edmonson  
September 28, 2022

### **State of California Department of Transportation**

The City received a comment letter from the California Department of Transportation (Caltrans). The letter includes comments on the project and transportation within the planning area; these comments are summarized below. Responses are provided to comments that raise concerns about the environmental analysis contained within the IS/MND.

- The beginning of the letter provides a brief summary of the project evaluated within the IS/MND, noting that “project represents a policy document and does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur.”
- The commenter provides a discussion of Vehicle Miles Traveled (VMT), noting VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020.
- The commenter provides a discussion on the importance of multi-modal transportation noting “all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. “ and “Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.”
  - Response: As noted by the commenter, the project is a policy document that does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. As site-specific development projects are proposed, the City will review projects for adherence to applicable city policy and planning documents regarding multi-modal transportation, including the General Plan and Bicycle Master Plan. The General Plan includes several policies that support transit, bicycle and pedestrian travel. These policies include the following:
    - Policy 4:3: Continue to coordinate with Metro and Foothill Transit to identify improvements to local and express bus service to Monrovia. Coordinate with these agencies to develop common standards for transit stops in the City, including seating, lighting, shelters and signage. Identify funding sources to implement the improvements determined to be necessary.
    - Policy 4:5: Require new development along arterial streets to provide transit facilities, such as bus shelters and turn-outs designed to established standards and specifications, where deemed necessary.

- Policy 4:6: Encourage employers to reduce vehicular trips through carpooling and vanpooling and by offering employees incentives such as reduced-rate transit passes.
  - Policy 4:7: Plan for the provision of a mixed-use “Transportation Center” with a mix of uses including those that provide services for the commuter such as a park-and-ride facility to serve regional freeways (high occupancy vehicle lanes) and bus and light rail services.
  - Policy 4:9: Investigate new opportunities to further finance demand-responsive transit service.
  - Policy 4:10: Coordinate the location of future transit routes with high-demand areas. Encourage development of mixed-use Planned Development projects (e.g., joint parking structures) surrounding the light rail transit station.
  - Policy 6:1: Provide for the safety of pedestrians and bicycles by adhering to state and national standards and uniform practices.
  - Policy 6:3: Maintain existing pedestrian facilities (sidewalks and trails) and encourage new development to provide pedestrian routes to adjacent developments. Respond in a timely manner to citizen requests regarding maintenance concerns on all public pedestrian facilities.
  - Policy 6:5: Encourage the provision of an accessible and secure area for bicycle storage at all new and existing developments.
  - Policy 6:6: Encourage provision of bicycle racks or storage facilities at public gathering places.
  - Policy 6:7: Maintain established bicycle facilities within the City according to established design standards. Review the signage on the existing bikeways and install additional signage as appropriate. Respond in a timely manner to citizen requests regarding maintenance concerns on all bicycle facilities.
  - Policy 6:8: Require new developments to provide adequate pedestrian paths on adjacent streets, including wheelchair ramps, and through the development projects, where determined to be appropriate.
- The commenter suggested the use of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications noting “We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements for this project or for any future project.”
  - Response: As noted by the commenter, the project is a policy document that does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. As site-specific development projects are proposed, the City will review projects for adherence to applicable planning

documents, including the General Plan. The General Plan includes several policies that address TDM strategies. These policies include the following:

- Policy 8:3: Encourage employers to include parking provisions in transportation demand management (TDM) plans, such as preferentially-located parking for carpools.
- Policy 9:6: Require that proposals for major new developments (as defined in the City's TDM ordinance) include submission of a TDM plan to the City, including monitoring and enforcement provisions. Also, require that a regional impact assessment be included in traffic impact reports for all new major development projects.

Additionally, the General Plan Draft EIR (page 3.10-12) includes the following discussion about ITS:

*Further, the following key improvements to the City's transportation system are planned that will result in capacity changes at several locations and circulation changes in the City:*

- *ITS Improvements – The City and surrounding jurisdictions have been working with Los Angeles County to make Intelligent Transportation System (ITS) improvements on key arterial streets in the San Gabriel Valley. These improvements will result in increased lane capacities by improving signal coordination. With the implementation of these improvements, segment capacities of 900 vehicles per hour per lane on Huntington Drive and Myrtle Avenue south of Huntington Drive are anticipated (study locations 10-15, 25-31, and 66).*
- The commenter provides a reference to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA).
  - Response: Section 8 of the IS/MND includes a discussion of greenhouse gas analysis. Unfortunately the commenter does not identify specific concerns about the greenhouse gas analysis and no further response can be provided.
- The commenter provided the following comment regarding VMT analysis:

*Caltrans encourages lead agencies to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.*

*“Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric. The General Plan EIR identified roadway and freeway segment LOS impacts and Mitigation Measure TRANS-1*

*was identified to reduce this impact, but not to less than significant; this impact was considered significant and unavoidable, and the City adopted a Statement of Overriding Consideration. The proposed Project is consistent with the analysis in the General Plan EIR because land use and zoning designations are unchanged, and VMT under the General Plan EIR and the proposed Project would be similar.” This “similar Project VMT and VMT threshold should be disclosed to the public in order to determine the significant traffic impact.*

- Response: As noted in the IS/MND, the Initial Study for the 2021-2029 Housing Element Update and implementation of the Monrovia Housing Plan, Safety Element Update and Environmental Justice Element has been prepared to tier from the General Plan Land Use and Circulation Elements EIR (General Plan EIR) of the City of Monrovia, as amended or otherwise supplemented. The proposed Project does not include any changes to the existing General Plan land use designations or Zoning designations, and the Inventory Sites’ dwelling units could be developed with the existing designations. As such, the analysis within this document considers the potential Housing Element Update dwelling unit buildout to be consistent with the housing unit buildout evaluated within the General Plan EIR. All inventory sites included in the Housing Element are located within a Transit Rich Priority Area (an area within ½ mile of an existing major transit stop (the L Line Metro Station) or an existing stop along a high transit corridor (Foothill Transit Line 270 on Huntington Drive). The City’s Transportation Study Guidelines for Vehicles Miles Traveled screen out projects within a Transit Priority Area. Accordingly, the inventory sites will not require VMT analysis. Therefore, no substantial increase in the severity of previously identified transportation impacts associated with the proposed Project would occur, nor would the significant unavoidable impacts identified in the General Plan EIR be worsened; additional analysis is not required.
- The commenter indicates that the City should “implement a fee program on the State facilities.”
  - Response: As described previously, the proposed Project does not include any changes to the existing General Plan land use designations or Zoning designations, and the Inventory Sites’ dwelling units could be developed with the existing designations. As such, the analysis within the IS/MND considers the potential Housing Element Update dwelling unit buildout to be consistent with the housing unit buildout evaluated within the General Plan EIR. No substantial increase in the severity of previously identified transportation impacts associated with the proposed Project would occur, nor would the significant unavoidable impacts identified in the General Plan EIR be worsened. There are no new or more significant impacts associated with the proposed Project, and new mitigation measures, such as a fee program on State facilities, would not be required.
- In the final comment, the commenter notes “We would like to have the opportunity to assist the City to identify any potential safety improvement locations.”

- Response: The commenter does not identify specific locations nor state if the concerns are specifically related to implementation of the project, so a further response cannot be provided. Regardless, the city staff is always available to discuss safety concerns Caltrans may have.



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The San Gabriel Band of Mission Indians recognized by  
the State of California as the aboriginal tribe of the Los Angeles basin

September 19,2022

Project Name: City Monrovia's Focused General Plan Updates

Thank you for your letter dated September 15,2022. Regarding the project above. This is to concur that we agree with the General Plan Update. However, our Tribal government would like to request consultation for all future projects within this location.

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

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Letter 2  
Andrew Salas  
September 19, 2022

**Gabrieleno Band of Mission Indians – Kizh Nation**

This commenter agrees with the General Plan Update and requests consultation for all future projects within the city. This comment is noted, but does not raise specific concerns about the analysis or information contained within the IS/MND.



September 26, 2022

Ref. DOC 6682775

Mr. John Mayer, Senior Planner  
City of Monrovia  
Community Development Department  
415 South Ivy Avenue  
Monrovia, CA 91016

Dear Mr. Mayer:

**NOI Response to 2021-2029 Housing Element Update,  
Safety Element Update, and New Environmental Justice Element**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration for the subject project on September 2, 2022. The City of Monrovia (City) is located within the jurisdictional boundaries of District Nos. 15 and 22. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The Districts should review individual developments within the City to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
3. The wastewater generated by the City will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average recycled flow of 62.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.
4. In order to estimate the volume of wastewater the project will generate, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits and select Will Serve Program, and then click on the [Table 1. Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining



the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or [mandyhuffman@lacsdsd.org](mailto:mandyhuffman@lacsdsd.org).

Very truly yours,

*Mandy Huffman*

Mandy Huffman  
Environmental Planner  
Facilities Planning Department

MNH:mnh

Letter 3  
Mandy Huffman  
September 26, 2022

### Los Angeles County Sanitation Districts

The City received a comment letter from the Los Angeles County Sanitation Districts (Districts). The letter includes comments on wastewater services within the planning area; these comments are summarized below. Responses are provided to comments that raise concerns about the environmental analysis contained within the IS/MND.

- The commenter notes the Districts owns, operates and maintains large trunk serves, but that local collector/lateral sewer lines are the responsibility of the jurisdiction they are located within. The commenter also states that “Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts’ facilities that serve the City.”
  - Response: Page 95 includes the following description of the wastewater system: *“The local wastewater collection system is owned and operated by the City. The City’s location in the foothills allows the sewer system to operate primarily via gravity flow. The City, through its Public Works Department, owns, operates, and maintains a sanitary sewer collection system including approximately 92 miles of City sewers with sewer pipe sizes varying in diameters from 6 inches to 24 inches. Wastewater generated in Monrovia is carried by the local pipe system to trunk sewers operated by the County Sanitation Districts of Los Angeles County (Sanitation Districts).”*
  - Response: Page 96 includes the following description of utility service associated with the project: *“Future development projects on Inventory Sites included in the Housing Element Update would fall within the development levels evaluated within the General Plan EIR and is consistent with growth anticipated in the General Plan. Utility agencies and companies develop master service plans based on anticipated land uses outlined in the General Plans of the various jurisdictions they serve; these master plans have already taken into account the growth anticipated under the Housing Element Update, which is consistent with the growth that is anticipated in the General Plan and the General Plan EIR. In addition, future development projects are required to assure adequate utility service during the development review and CEQA process. Therefore, utility impacts associated with the proposed Project are consistent with those previously analyzed in the General Plan EIR. This impact would be less than significant, and no mitigation is required.”*
- The commenter states that the Districts should review individual developments within the City to determine whether if adequate trunk sewer capacity existing to serve each project.
  - Response: The project is a policy document that does not specifically authorize the construction of any housing development, nor does it indicate where and when specific new housing projects will occur. As noted on page 96 of the IS/MND, as site-specific development projects are proposed, the future development projects are required to assure adequate utility service during the development review and CEQA process. This would include consultation with the Districts.
- The commenter provides information about Districts facilities.
  - Response: The following text revisions are recommended to Section 19, Utilities and Service Systems, page 96, paragraph 6 of the IS/MND:

The City owns, operates, and maintains the local sewer lines that collect wastewater generated within the City, which includes approximately 92 miles of City sewers with pipelines varying from 6 inches to 24 inches in diameter. Wastewater collected in the City's trunk sewer lines flows south to the Los Angeles County Sanitation District (LACSD) wastewater treatment facilities. The wastewater generated by the City will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average recycled flow of 62.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.

- The commenter provides links in order to estimate the volume of wastewater that projects would generate.
  - Response: The following text is included on page 97 of the IS/MND describing the wastewater analysis: *“Future development projects associated with implementation of the proposed Project would generate additional wastewater for conveyance and treatment. The Project does not propose changes to the land use or zoning designations of parcels within the City and would be consistent with the development assumptions included in the General Plan EIR. Accordingly, growth associated with implementation of the proposed Project is consistent with the General Plan growth projections which were evaluated in the General Plan EIR. In addition, future development projects are required to assure adequate wastewater service during the development review and CEQA process. Therefore, there would be no new wastewater treatment impacts that have not already been analyzed in the General Plan EIR. The impact would be less than significant, and no mitigation is required.”*
- The commenter describes the Districts' connection fees.
  - Response: Any development proposed within the City would be required to pay all applicable utility connection fees.
- The comment notes that the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG.
  - Response: As described in the IS/MND, the Housing Element is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). Implementation of the project would be consistent with the regional growth forecast adopted by SCAG.

## **Summary of Text Revisions**

Specific changes to the text of the IS/MND that are being recommended to clarify any errors, omissions, or misinterpretation of materials in the IS/MND, in response to comments received during the public review period or clarifications initiated by staff, are presented below. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the IS/MND. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted is shown in ~~strikeout~~. Page numbers correspond to the page numbers of the IS/MND. The following text revisions are recommended to Section 17, Transportation and Traffic, page 92, paragraph 1 of the IS/MND:

Implementation of the proposed Project would result in the future development projects in the City, although the anticipated growth would be within the limits identified in the General Plan and General Plan EIR. Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric. The General Plan EIR identified roadway and freeway segment LOS impacts and Mitigation Measure TRANS-A~~1~~ was identified to reduce ~~this roadway impacts~~, but not to less than significant; ~~this~~ These roadway and freeway segment impacts was were considered significant and unavoidable, and the City adopted a Statement of Overriding Consideration. The proposed Project is consistent with the analysis in the General Plan EIR because land use and zoning designations are unchanged, and VMT under the General Plan EIR and the proposed Project would be similar. Development associated with implementation of the proposed Project would not result in a new significant impact. Furthermore, no substantial increase in the severity of previously identified impacts associated with the proposed Project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened.

The following text revisions are recommended to Section 19, Utilities and Service Systems, page 96, paragraph 6 of the IS/MND:

The City owns, operates, and maintains the local sewer lines that collect wastewater generated within the City, which includes approximately 92 miles of City sewers with pipelines varying from 6 inches to 24 inches in diameter. Wastewater collected in the City's trunk sewer lines flows south to the Los Angeles County Sanitation District (LACSD) wastewater treatment facilities. The wastewater generated by the City will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average recycled flow of 62.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.