

# PLANNED DEVELOPMENT GENERAL PLAN AMENDMENT, ZONING CODE AMENDMENT, & ALEXAN FOOTHILLS SPECIFIC PLAN

SCH No. 2018101058

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PUBLIC DRAFT



EIR, Volume I  
September 2019





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Monrovia, CA 91016  
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TRAMMELL CROW RESIDENTIAL



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# 1. INTRODUCTION

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## Overview

The City of Monrovia (City) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and has prepared this Draft Environmental Impact Report (DEIR) for a proposed 9.63-acre Planned Development (PD) General Plan Amendment (GPA) and Planned Development Zoning Code Amendment (ZCA), as well as a proposed 6.77-acre Alexan Foothills Specific Plan (Specific Plan) within a portion of the area proposed for the GPA and ZCA (i.e., ZCA Area B). This Environmental Impact Report (EIR) includes a program-level review of the proposed GPA and ZCA and a project-level analysis of the Alexan Foothills Specific Plan.

The City is in the San Gabriel Valley region of Los Angeles County. The Project comprises one City block on approximately 9.63 acres. The City block is bounded by West Evergreen Avenue to the north, South Magnolia Avenue to the east, South Mayflower Avenue to the west, and the METRO Gold Line to the south (Figure 1-1). The 6.77-acre Alexan Foothills Specific Plan area is located at 1625 Magnolia Avenue, Monrovia, California and depicted in yellow on Figure 1-2.

Adoption of a GPA and ZCA, and adoption and implementation of the Alexan Foothills Specific Plan are collectively defined as a “Project” subject to review under the CEQA (Public Resources Code, Section 21000 et seq.) and the State CEQA Guidelines (CEQA Guidelines) (California Code of Regulations, Section 15000 et seq.). Accordingly, the City has prepared this EIR to assess the short-range, long-range, and cumulative environmental consequences that could result from adoption of a GPA and ZCA and approval of the project development within the Alexan Foothills Specific Plan. This EIR has also been prepared in accordance with the City’s rules and procedures for implementing CEQA.

The City is proposing the GPA and ZCA while Trammell Crow Residential proposes to implement and develop residential uses consistent with the Alexan Foothills Specific Plan, which requires adoption of both a proposed GPA and ZCA as well as the Specific Plan. The City is the Lead Agency for the preparation of this EIR, as defined by CEQA (Public Resources Code, Section 21067) because the City has primary discretionary authority with respect to adoption of the Project. The content of this document reflects the independent judgment of the City.

Upon preliminary review of the Project, the City determined that the Project could have substantial adverse environmental impacts and that preparation of an EIR would be required for the Project (CEQA Guidelines Section 15060[d]).

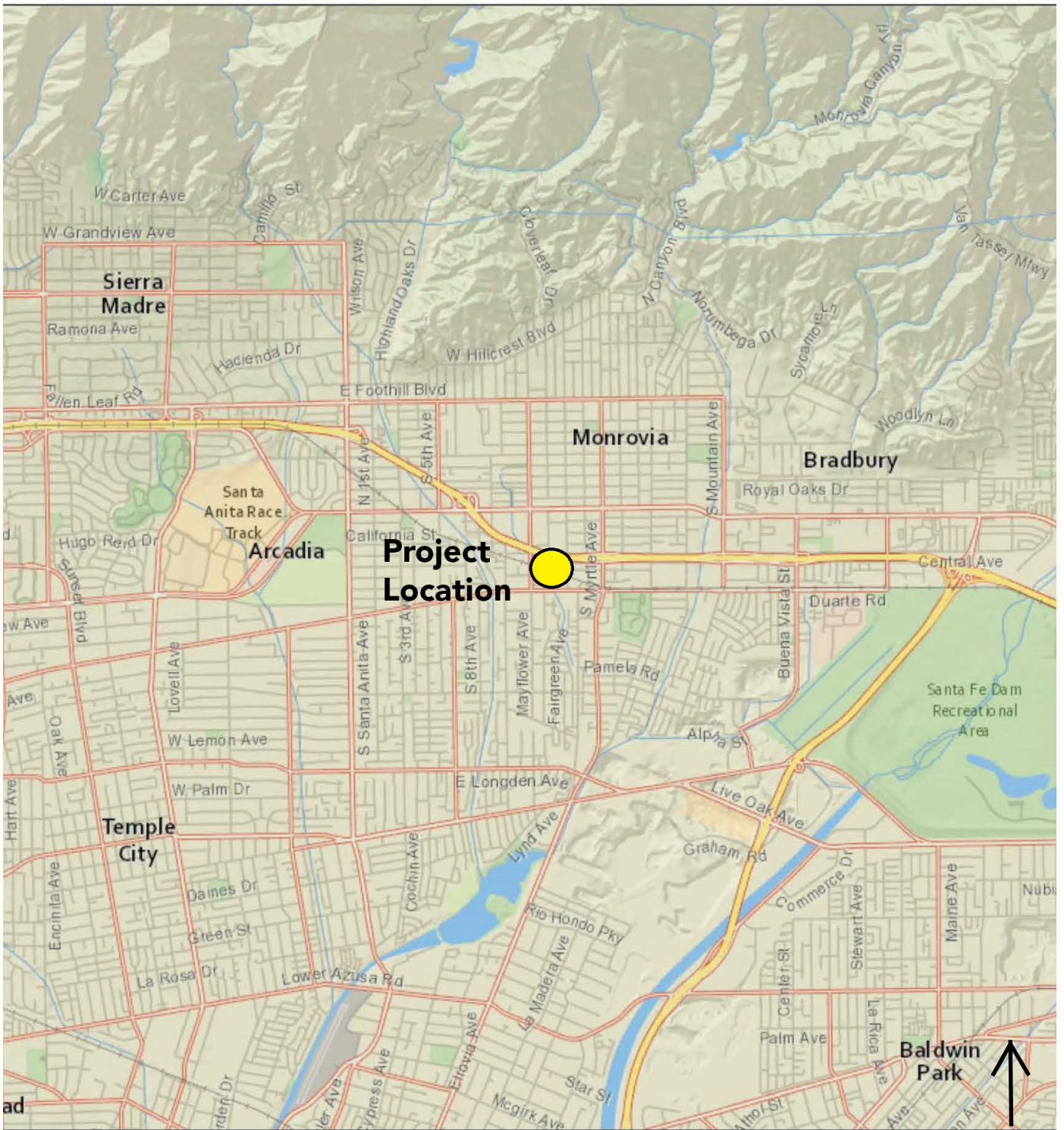
## California Environmental Quality Act

The body of State Law known as “CEQA” was originally enacted in 1970. The legislative intent is set forth in Section 21000 of the California Public Resources Code:

“The Legislature finds and declares as follows:

- (a) The maintenance of a quality environment for the people of this State now and in the future is a matter of Statewide concern.

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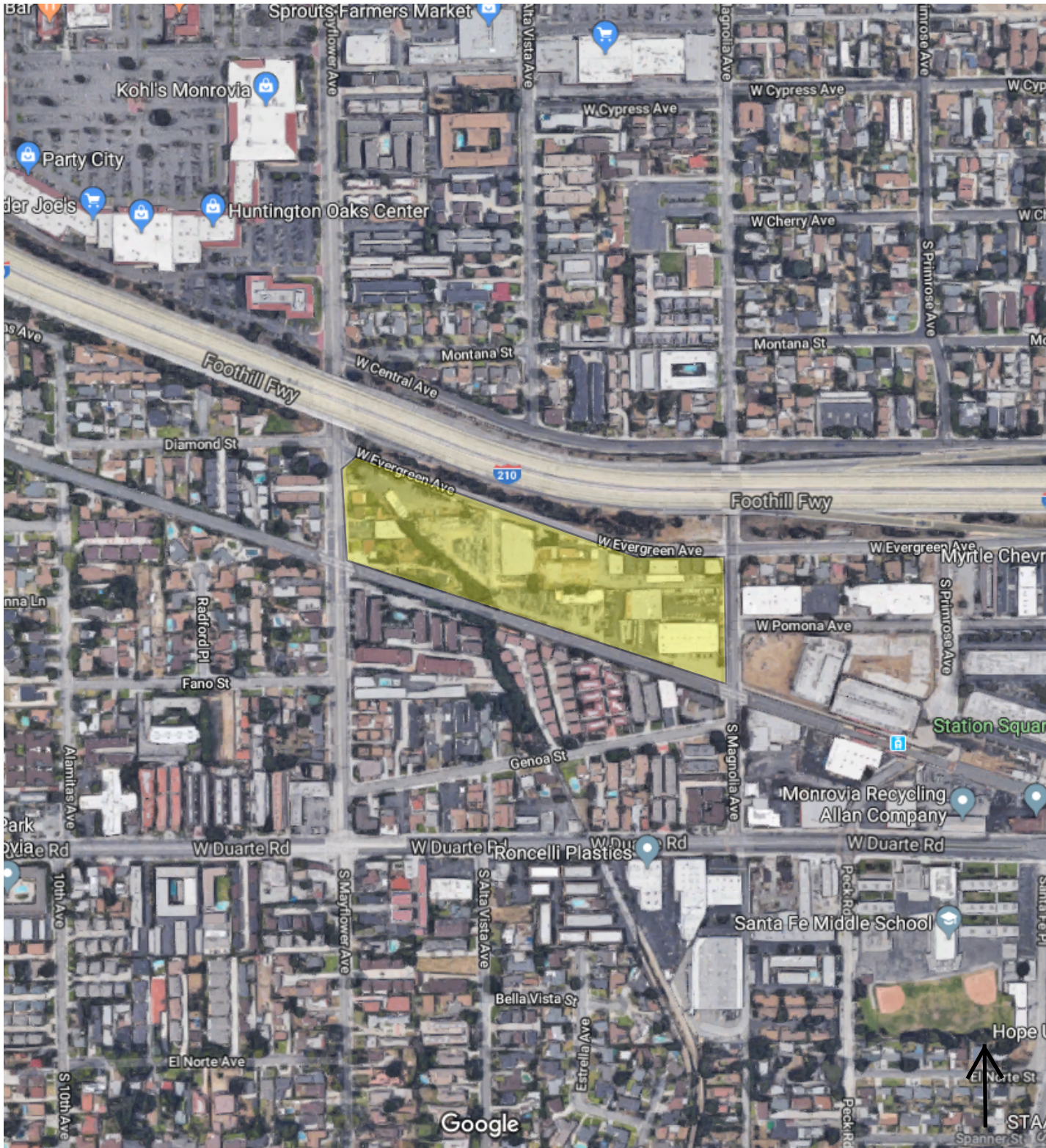
Source: ©2019 Google

**Figure 1-1 Project Location Map**

PD GPA, PD ZCA, & Alexan Foothills Specific Plan Project

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Source: ©2019 Google

 Project Area

**Figure 1-2 Project Area Map**

PD GPA, PD ZCA, & Alexan Foothills Specific Plan Project

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

The Legislature has further declared, in Section 21001, that it is the policy of the State to:

- (1) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the State.
- (2) Take all action necessary to provide the people of this State with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- (3) Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- (4) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- (5) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

- (f) Require Governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- (g) Require Governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for approval, is found in Section 21002.

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

## **1.1 PURPOSE AND SCOPE**

### **General Plan Amendment and Zoning Code Amendment**

The GPA and ZCA would modify the City’s long-range planning program (General Plan) and implementation tool (Zoning Code) that guide orderly growth and development of the 9.63-acre Project area. The City’s General Plan guides the City’s vision of its future and establishes a policy framework to govern decision-making concerning the physical development of the community, including assurances that the community at large will be supported by an adequate range of public services and infrastructure systems. The Zoning Code establishes development standards for different land use types.

### **Alexan Foothills Specific Plan**

A Specific Plan is a policy document that guides the proposed transition and development of an area. The Alexan Foothills Specific Plan is being prepared consistent with the requirements set forth in Article 8, Chapter 3 of the California Government Code. Specifically, the Alexan Foothills Specific Plan contains the following required detail:

- (1) The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan.
- (2) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.

- (3) Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- (4) A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).

In addition, the Alexan Foothills Specific Plan would include a statement of the relationship of the Specific Plan to the City's General Plan.

## 1.2 ORGANIZATION OF THE EIR

The Draft EIR is divided into three volumes. Volume I contains the primary analysis of potential environmental impacts discussed in the following Chapters:

Chapter 1:	Introduction – A review of the overall document
Chapter 2:	Summary – Describes the Project and summarizes Project impacts and mitigation measures
Chapter 3:	Project Description – Provides a detailed description of the Project
Chapters 4 to 20:	Environmental Impact Analysis – Considers Project impacts and identifies mitigation measures for each issue of concern, as applicable
Chapter 21:	Alternatives – Provides an analysis of alternatives to the Project
Chapter 22:	CEQA Mandated Sections – Provides an analysis of cumulative impacts, growth-inducing impacts, and significant irreversible environmental impacts, and identifies areas of no significant impact
Chapter 23:	Preparers – Provides a list of professional and qualified consultants responsible for preparing the EIR

Volumes II and III include the EIR appendices, including documentation of the EIR scoping process and Notice of Preparation (NOP). The 13 appendices include:

- Appendix A: Notice of Preparation (NOP)
- Appendix B: NOP Distribution List and Scoping Comments
- Appendix C: Air Quality Impact Analysis Report
- Appendix D: Biological Resources Documentation
- Appendix E: Cultural Resources Documentation
- Appendix F: Geotechnical Report
- Appendix G: Hazardous Waste Investigation and Hazards Reports
- Appendix H: Hydrology & LID Report
- Appendix I: Noise Study

- Appendix J: Traffic and Circulation
- Appendix K: Utilities Documentation
- Appendix L: Persons and Agencies Contacted
- Appendix M: Plan Set, 3D Renderings, Shade & Shadow Analysis, and View Simulations

In compliance with Public Resources Code Section 21081.6, a Mitigation Monitoring Reporting Program (MMRP) will be prepared as a separate document that will be adopted in conjunction with the certification of the Final EIR. The MMRP, responses to public comments, any revisions to the Draft EIR, and Findings will be included as Volume IV.

### **1.3 APPROACH TO EIR ANALYSIS**

The approach to the analysis presented in this EIR is both programmatic and project-specific in nature given the different scopes associated with adoption of a GPA and ZCA and approval of the Alexan Foothills Specific Plan.

#### **Programmatic Analysis**

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR includes a programmatic analysis of the GPA and ZCA consistent with Section 15168 of the CEQA Guidelines. In a program EIR, later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared, leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152 of the CEQA Guidelines.

#### **Project Level Analysis**

This EIR has also been prepared as a project-level EIR as defined by Section 15161 of the CEQA Guidelines for the Alexan Foothills Specific Plan. Specifically, Section 15161 of the CEQA Guidelines indicates that a project-level EIR is the most common type of EIR and examines the environmental impacts of a specific development proposal. This type of EIR focuses primarily on the changes in the environment that could result from the development of a project. This EIR examines all phases of buildout of the Alexan Foothills Specific Plan including planning, construction, and operation.

#### **Environmental Analysis**

Each environmental issue is analyzed in the same manner, starting with a discussion of the existing environmental setting, including physical conditions and pertinent planning and regulatory framework. Thresholds of significance are then defined and are used to measure the potential impact to the environment. Thresholds of significance are based on a list of questions and impact topics set forth in Appendix G of the CEQA Guidelines. The impact analysis then examines both the broad, long-term environmental effects resulting from implementation of a GPA and ZCA, and the localized, project-level effects of the Alexan Foothills Specific Plan. If the analysis indicates that a significant impact could occur, mitigation measures are provided.

## 1.4 SCOPING AND PUBLIC REVIEW

To define the scope of the investigation of the EIR, the City distributed a Notice of Preparation (NOP) (included in Appendix A of Volume II of this EIR) to City, County, and State Agencies; other public agencies; and interested private organizations and individuals. The NOP review period ran from October 22, 2018 through November 26, 2018. The purpose of the NOP was to identify agency and public concerns regarding potential impacts of the Project, and to request suggestions to avoid significant impacts (CEQA Guidelines Section 15082).

Six written comments were received during the scoping period for the NOP by the South Coast Air Quality Management District (SCAQMD), Native American Heritage Commission (NAHC), Caltrans, Southern California Association of Governments (SCAG), County Sanitation Districts of Los Angeles County, and Southwest Regional Council of Carpenters. They are included in Appendix B of Volume II of this EIR and summarized in Table 1-1 below.

**Table 1-1 Summary of Scoping Comments**

<b>Commenting Entity</b>	<b>Summary of Comment</b>	<b>Section in EIR where Addressed</b>
South Coast Air Quality Management District (SCAQMD)	Requested electronic copies of all models used in the analyses and a hard copy of the full EIR and Appendices sent to SCAQMD directly.	Mailing of Public Draft EIR
	Requested a Health Risk Assessment due to proximity of Project to Interstate-210.	Chapter 7, Air Quality, and Appendix C
Native American Heritage Commission (NAHC)	Reminder of the Assembly Bill (AB) 52 and Senate Bill (SB) 18 requirements and process.	City's AB 52 and SB 18 consultation process is summarized in Chapter 9, Cultural Resources
Caltrans District 7	Evaluate project trips on the eastbound I-210 on/off-ramps from Myrtle Avenue/West Evergreen Avenue and westbound I-210 on/off-ramps from Myrtle Avenue/East Central Avenue. Analyze operations of freeway segments in the vicinity of the Project.	Chapter 19, Transportation and Circulation
Southern California Association of Governments (SCAG)	Encouraged an evaluation of the Project's consistency with the goals and population projections of the 2016 Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS).	Chapter 14, Land Use and Planning
County Sanitation Districts of the Los Angeles County	Estimated the projected wastewater that would be generated by the Alexan Foothills Specific Plan using the District's wastewater generation factors and reported the current capacity of the District's nearest sewer main and wastewater treatment plant.	Chapter 20, Utilities
Southwest Regional Council of Carpenters	Project Description needs to discuss whether relocation of cell towers is proposed under current Project description or under Project alternatives.	Clarified in Chapter 3, Project Description
	EIR should evaluate impacts associated with full buildout of the Project, including the GPA, ZCA, and Alexan Foothills Specific Plan subject to a program-level of review.	Chapters 5 through 20
	EIR should consider impacts on energy conservation and growth inducing impacts.	Chapter 11, Greenhouse Gas Emissions & Energy

**Table 1-1 Summary of Scoping Comments**

Commenting Entity	Summary of Comment	Section in EIR where Addressed
		Consumption, and Chapter 22, CEQA-Mandated Sections
	The City should analyze cumulative impacts on air quality and global climate change and greenhouse gas emissions utilizing appropriate thresholds of significance.	Contained in Chapters 7, Air Quality, and Chapter 11, Greenhouse Gas Emissions & Energy Consumption
	The EIR should analyze the potential for exposure of humans to hazards and hazardous waste given the existing and past uses at the Project site.	Chapter 12, Hazards and Hazardous Materials

Pursuant to Section 15085 of the CEQA Guidelines, a Notice of Completion (NOC) was filed with the State Office of Planning and Research (OPR) on September 26, 2019, and the Draft EIR will be circulated for public and agency review for a period of 45 days ending on November 10, 2019. A copy of the Draft EIR will be posted at the City of Monrovia’s Community Development Department at 415 South Ivy Avenue, Monrovia, CA 91016 as well as on the City’s Community Development Department website. Copies of the Draft EIR will be sent to responsible agencies, local agencies, and concerned agencies and individuals, as requested. Public Hearings on the Draft EIR will be held in conjunction with the decision-maker review of the Project.

Comments from all agencies and individuals are invited regarding the information contained in the Draft EIR. Such comments should explain any perceived deficiencies in the assessment of impacts, provide the information that is purportedly lacking in the Draft EIR or indicate where the information may be found. All comments on the Draft EIR are to be submitted to:

John Mayer, Senior Planner  
 City of Monrovia  
 Community Development Department  
 415 South Ivy Avenue, Monrovia CA 91016  
[jmayer@ci.monrovia.ca.us](mailto:jmayer@ci.monrovia.ca.us)

Following a 45-day period of circulation and review of the Draft EIR, all comments and the City’s responses to the comments will be incorporated into a Final EIR prior to certification of the document by the City.

## 1.5 CITATION

Information from many sources, including the appendix materials previously listed and numerous other references, were used to conduct the impact analysis in this EIR. Pursuant to Section 15148 of the CEQA Guidelines, citations from the appendix materials and other sources are provided throughout the EIR. Citations are provided in parenthesis when used and are inclusive to each environmental impact topic. References cited are included at the end of each Chapter. Per Section 15150 of the CEQA Guidelines, the Land Use Element of the General Plan for the City of Monrovia (City of Monrovia 2018) and the EIR for revisions to the Land Use

and Circulation Elements of the General Plan (City of Monrovia 2008) are incorporated herein by reference.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AB	Assembly Bill
CEQA	California Environmental Quality Act
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
GPA	General Plan Amendment
METRO	Los Angeles County Metropolitan Transportation Authority
MMRP	Mitigation and Monitoring Reporting Program
NOC	Notice of Completion
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
OPR	Office of Planning Research
PD	Planned Development
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
RTP/SCS	Regional Transportation Plan/Sustainable Community Strategies
ZCA	Zoning Code Amendment

### **References Cited**

City of Monrovia

2008 Monrovia General Plan Proposed Land Use and Circulation Elements, Environmental Impact Report (EIR) SCH No. 2007021135. Monrovia, CA. January.

2018 General Plan, Land Use Element. September.

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## 2. SUMMARY

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This EIR chapter provides a summary description of the Project, a list of associated environmental issues to be resolved, a summary of significant impacts and mitigation measures, and a summary of alternatives to the Project (pursuant to CEQA Guidelines Section 15123, Summary).

### 2.1 PROPOSED PROJECT

The City of Monrovia (City) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and has prepared this Draft Environmental Impact Report (DEIR) for a proposed 9.63-acre Planned Development (PD) General Plan Amendment (GPA) and Planned Development Zoning Code Amendment (ZCA), as well as a proposed 6.77-acre Alexan Foothills Specific Plan (Specific Plan) within a portion of the area proposed for the GPA and ZCA (ZCA Area B). This Environmental Impact Report (EIR) includes a program-level review of the proposed GPA and ZCA and a project-level analysis of the Alexan Foothills Specific Plan.

The City is in the San Gabriel Valley region of Los Angeles County. The Project comprises one City block on approximately 9.63 acres. The City block is bounded by West Evergreen Avenue to the north, South Magnolia Avenue to the east, South Mayflower Avenue to the west, and the METRO Gold Line to the south. The 6.77-acre Alexan Foothills Specific Plan area is located at 1625 Magnolia Avenue, Monrovia, California.

#### General Plan Amendment

The GPA area encompasses the entire Project area. Current land uses within the 9.63-acre GPA area include a mix of residential, industrial, and institutional uses, which are described in more detail below under the ZCA area heading.

#### Zoning Code Amendment

The ZCA area encompasses the same 9.63 acres as the GPA area.

The Project area is currently developed with a mix of light industrial (approximately 70,750 square feet) and warehouse (approximately 10,120 square feet) uses with five single-family residences, an institutional place of worship (approximately 6,630 square feet), and an office. The Project area also contains private surface parking throughout the area and two cellular towers.

Three areas have been defined with the ZCA area, referred to as Areas A, B, and C, which are described as follows:

- Area “A” encompasses 2.30 acres in the western portion of the Project area where there is a mix of residential and commercial/industrial buildings;
- Area “B” encompasses the middle 6.77-acre portion (the Alexan Foothills Specific Plan area). This area is developed with three light industrial structures, one residential unit, the institutional place of worship and associated trailers, the commercial office building,

and one asphalt covered storage lot, all constructed between 1942 and 1987. The following parcels are within the Alexan Foothills Specific Plan boundaries (Assessor Parcel Numbers [APNs] 8507-006-016, -022, -024, -035, -041, -042, -043, and -044); and

- Area “C” encompasses the 0.56-acre northeastern portion of the Project area and is developed with three commercial/industrial buildings.

The ZCA will establish a Planned Development Area (PD-27: Station Square West [PD-27]) for the entire 9.63-acre Project area in order to be consistent with the GPA. A zone change for 2.86 acres is proposed from Manufacturing to a Planned Development Area to include high density residential development as well as other uses identified in PD-27 for Areas A and C (ZCA Areas A and C). The Alexan Foothills Specific Plan would comprise ZCA Area B.

While a new zoning designation is proposed for ZCA Areas A and C, the existing uses and structures, would be allowed to remain as legal conforming uses. Although a specific development plan is neither being proposed nor considered at this time for these two areas, the redesignation of PD-27 ZCA Areas A and C could eventually result in development of an additional 82 dwelling units in Area A (based on the 54 dwelling units/acre permitted land use density within the overall 9.63-acre GPA area).

### **Alexan Foothills Specific Plan**

The Alexan Foothills Specific Plan would allow a 436-unit, five-story apartment complex and an eight-level (seven stories) parking structure, containing 798 stalls. The apartment complex would include two pools and several tenant amenity courtyards. The Magnolia Avenue street frontage proposes a two-story lobby, fitness room, and four live-work units, all with apartments above. Three outdoor/rooftop amenity decks are planned on top of the apartment complex’s fourth level; two rooftop decks face the San Gabriel Mountains to the north, and the other faces west. Other tenant amenities include a pet spa, bike “kitchen” (i.e., bicycle repair area), tenant lounge, centralized mail/package delivery room, and a golf simulation room. No offsite improvements to utilities are proposed under the Specific Plan.

### **Project Objectives**

The objectives for the PD GPA are as follows:

- Objective GPA-1. Create a cohesive and complementary land use plan that provides additional opportunities for transit oriented development opportunities to support Station Square Transit Village (PD-12).

The objectives for the PD ZCA are as follows:

- Objective ZCA-1. Provide flexibility in land use types and intensities that will allow future development to respond to changes in the marketplace over time.
- Objective ZCA-2. Provide land use guidance for three distinct areas (Areas A, B, and C) within the Planned Development Area PD-27: Station Square West area.

The objectives for the Alexan Foothills Specific Plan are as follows:

- Objective SP-1. Provide more opportunities for high-density housing near transit within Area B and the City by increasing density to 54 units per acre to meet the goals of the City's Housing Element.
- Objective SP-2. Broaden the type of housing options in the City by creating opportunities for modern, attractive, multi-family residential development.
- Objective SP-3. Accommodate a walkable urban form in the City by improving the pedestrian environment with active, small-format ground-floor public spaces, accessible sidewalks and pathways, and pedestrian amenities.
- Objective SP-4. Improve multi-modal accessibility, connectivity, and safety by providing public parking for METRO's Monrovia Gold Line Station, providing accessible pathways to enable safe access to the METRO station, and by promoting bicycle use by providing convenient bicycle amenities and storage options.
- Objective SP-5. Improve the physical character and aesthetic appeal of the area with the gradual introduction of new developments that include attractive architectural styles, landscaping, connectivity and walkability, public art, and welcoming and unified gateway elements.
- Objective SP-6. Integrate open space and resident amenities by integrating plazas and small gathering spaces, such as rooftop decks.

Implementation of the Project would require the following City actions:

- Approval of a GPA from Manufacturing to Planned Development Area PD-27: Station Square Area West for the 9.63-acre Project area;
- Approval of a ZCA from Manufacturing to Planned Development (PD) for 2.86 acres (Areas A and C) within Planned Development Area PD-27: Station Square Area West;
- Adoption of the Alexan Foothills Specific Plan for 6.77 acres (Area B) within Planned Development Area PD-27: Station Square Area West;
- Approval of a Conditional Use Permit (CUP) to authorize the construction of a 436-unit apartment complex within the Alexan Foothills Specific Plan area; and
- Approval of a Vesting Parcel Map to consolidate eight lots into one lot for the Alexan Foothills Specific Plan area.

## 2.2 ENVIRONMENTAL ISSUES

As required by the CEQA Guidelines, this EIR addresses the following areas of potential environmental impact or controversy known to the Lead Agency (the City), including those

issues and concerns identified by the City and other agencies, organizations, and individuals during circulation of the Notice of Preparation (NOP) for this EIR (dated October 22, 2018). These environmental concerns relate to the following topics (listed in the order that they are addressed in this EIR):

- Aesthetics and Visual Resources;
- Agriculture and Forestry Resources;
- Air Quality;
- Biological Resources;
- Cultural and Tribal Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions and Energy Consumption;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services and Recreation;
- Transportation and Circulation; and
- Utilities and Service Systems.

## **2.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

For each of the environmental topics listed above, any "significant" project or cumulative impact and associated mitigation measure or measures identified in this EIR are summarized in Table 2-1 below. More detailed impact discussions are contained in Chapters 5 through 20 of this EIR. The chart is arranged in four columns: (1) identified impacts; (2) recommended mitigation measures; (3) significance without mitigation; and (4) the level of impact significance after implementation of the mitigation measure(s).

**Table 2-1 Summary of Impacts**

Impacts	Mitigation Measures and Standard Conditions	Significance Without Mitigation	Significance With Mitigation
<b>Aesthetics and Visual Resources</b>			
Impact AES-1 Impacts on Scenic Vistas	NA	LS	NA
Impact AES-2 Impacts on Scenic Resources	NA	LS	NA
Impact AES-3 Impacts on Visual Character	<p><b>MM AES-1: Neighborhood Compatibility Design Review.</b> To ensure compatibility with the surrounding residential neighborhood, all future development in the PD-27 area, including non-residential development, shall undergo the Neighborhood Compatibility Design Review process outlined in Section 17.12.005 of the Residential Development Standards in the Monrovia Zoning Code. <b>Plan Requirements and Timing:</b> Prior to construction of future development in the PD-27 area, the development must complete the Neighborhood Compatibility Design Review process as outlined in Section 17.12.005 of the Monrovia Zoning Code. <b>Monitoring:</b> City staff shall ensure completion of the Design Review process prior to granting land use clearance for future development.</p> <p><b>MM AES-2: Maintenance of Construction Barriers.</b> Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours." <b>Requirements and Timing:</b> Measure shall be printed on all</p>	S	LS

S = Significant  
 LS = Less than significant  
 SU = Significant and unavoidable impact  
 NA = Not applicable

MM = Mitigation Measure  
 SC = Standard Condition

	<p>construction drawings. <b>Monitoring:</b> City staff shall conduct periodic site inspections during construction.</p>		
<p>Impact AES-4 Light, Glare, Shade and Shadows</p>	<p>Refer to mitigation measure MM AES -1.</p> <p><b>MM AES-3:</b> Lighting shall be directed and shielded to focus illumination onto the desired areas only and avoid light trespass into adjacent areas. Reflective glass, metallic, and other highly reflective and glare producing materials, shall not be used in new building construction. <b>Requirements and Timing:</b> Measure shall be printed on all construction drawings. <b>Monitoring:</b> City staff shall conduct periodic site inspections during construction.</p> <p><b>MM AES-4: Comprehensive Lighting Plan.</b> Prior to issuance of a building permit, the applicant shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America [IESNA]) and shall be in compliance with applicable standards of the City’s Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, onsite driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer:</p> <ul style="list-style-type: none"> <li>• Exterior onsite lighting shall be shielded and confined within site boundaries.</li> <li>• No direct rays or glare are permitted to shine onto public streets, freeways or adjacent sites.</li> <li>• Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted.</li> <li>• The site shall not be excessively illuminated based on the illumination recommendations of the IESNA.</li> </ul>	<p>S</p>	<p>LS</p>

S = Significant  
 LS = Less than significant  
 SU = Significant and unavoidable impact  
 NA = Not applicable

MM = Mitigation Measure  
 SC = Standard Condition

	<b>Requirements and Timing:</b> The Lighting Plan shall be reviewed and approved prior to issuance of building permits. <b>Monitoring:</b> The City's Community Development Director, or designee, shall review and approve the Lighting Plan prior to issuance of building permits.		
<b>Air Quality</b>			
Impact AIR-1 Consistency with the SCAQMD AQMP	NA	LS	NA
Impact AIR-2 Result in Cumulatively Considerable Increase in Criteria Pollutants	<p><b>SC AIR-1:</b> Comply with South Coast Air Quality Rule 1113 to reduce VOC emissions from architectural coating applications. Prior to the issuance of a building permit for the development, the applicant shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines. The applicant shall include in any construction contracts, and/or subcontracts, a requirement that contractors adhere to the requirements of the CRP. The CRP shall include a requirement that all interior and exterior residential and non-residential architectural coatings used in construction meet the SCAQMD "super compliant" coating VOC content standard of less than 10 grams of VOC per liter of coating. The CRP shall also specify the use of high-volume, low pressure spray guns during coating applications to reduce coating waste. <b>Requirements and Timing:</b> Applicant shall receive Planning Division approval of a Coating Restriction Plan (CRP) prior to receipt of building permits. <b>Monitoring:</b> City staff shall conduct site inspections to ensure that the CRP is followed during construction.</p> <p><b>SC AIR-2:</b> Comply with South Coast Air Quality Management District Rule 403, Fugitive Dust, by incorporating best available control measures during construction. <b>Requirements and Timing:</b> Standard condition shall be printed on construction drawings and included as a requirement in the construction contract. <b>Monitoring:</b> City staff shall conduct site inspections during construction to ensure that the standard condition is adhered to.</p> <p><b>SC AIR-3. Natural Gas Fireplaces.</b> All residential fireplaces installed shall be fueled by natural gas. Wood stoves and wood burning fireplaces shall be prohibited. (Consistent with General Plan EIR Mitigation Measure AIR-</p>	S	LS

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 LS = Less than significant  
 SU = Significant and unavoidable impact  
 NA = Not applicable

MM = Mitigation Measure  
 SC = Standard Condition

	<p>D). <b>Requirements and Timing:</b> Standard condition shall be printed on construction drawings. <b>Monitoring:</b> City staff shall conduct site inspections during construction to confirm condition is adhered to.</p> <p><b>MM AIR-1: Idling Restrictions.</b> Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:</p> <ul style="list-style-type: none"> <li>• When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;</li> <li>• 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;</li> <li>• To bring the equipment to the manufacturer’s recommended operating temperature;</li> <li>• When the ambient temperature is below 40 degrees F or above 85 degrees F; or</li> <li>• When equipment is being repaired.</li> </ul> <p><b>Requirements and Timing:</b> Mitigation measure shall be printed on construction drawings and included as a requirement in the construction contract. <b>Monitoring:</b> City staff shall conduct site inspections during construction to ensure that the mitigation measure is adhered to.</p>		
Impact AIR-3 Exposure of Sensitive Receptors to Substantial Pollutant Concentrations	<b>MM AIR-2:</b> For all new residential units in the Project area, the developer shall install, and owner maintain, HVAC systems with air filters meeting or exceeding the most current California Building Standards Code requirement for an ASHRAE Standard 52.2 Minimum Efficiency Rating Value (MERV) of 13 (a Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size). Air filters shall be	S	LS

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 LS = Less than significant  
 SU = Significant and unavoidable impact  
 NA = Not applicable

MM = Mitigation Measure  
 SC = Standard Condition



	replaced at a minimum of two times per year, or more, as needed, by the owner. <b>Requirements and Timing:</b> This measure shall be printed on construction drawings and included as a requirement of the construction contract for new residential buildings. This measure shall also be recorded in a Notice to Property Owner, which shall be provided to all occupants of the Alexan Specific Plan units and for each new residential property within the Project area. <b>Monitoring:</b> City staff shall confirm that HVAC units and MERV-13 filters (or better) are installed in accordance with this measure prior to final sign off on construction for all new residential units. City staff shall also review and approve of the Notice to Property Owner language and ensure recordation prior to final sign-off on construction of new residential units in the Project area.		
Impact AIR-4 Odors	NA	LS	NA
<b>Biology</b>			
Impact BIO-1 Nesting Birds	<p><b>MM BIO-1: Nesting Bird Protection.</b> If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist (as determined by a combination of academic training and professional experience in biological sciences and related resource management activities) no more than five (5) days prior to the beginning of excavation, grading and/or vegetation removal. Surveys shall be conducted in proposed work areas, staging and storage areas, along equipment transportation routes, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys shall be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus Buteo, the survey area shall encompass a 500-foot radius. Surveys shall be conducted during weather conditions suited to maximize the observation of possible nests and shall concentrate on areas of suitable habitat. If a lapse in project-related work of five (5) days or longer occurs, an additional nest survey shall be required before work can be reinitiated.</p> <p>If active nests are found during any preconstruction survey, a qualified biologist shall establish an appropriate buffer between the nest and active construction. The qualified biologist shall clearly mark the established</p>	S	LS

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- S = Significant
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  - NA = Not applicable
  - MM = Mitigation Measure
  - SC = Standard Condition

	<p>buffer. The applicant shall maintain the buffer until young have fledged and are foraging independently. The qualified biologist shall document pre-construction baseline monitoring of the nest to characterize “normal” bird behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and shall increase the buffer if birds are showing signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and flying away from the nest). If this is not possible, work shall cease in the area until young have fledged and the nest is no longer active (e.g. young have fledged, predation, or other non-anthropogenic nest failure). <b>Requirements and Timing:</b> Measure shall be printed on all construction drawings. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p>		
<p>Impact BIO-2 Potential Adverse Effects on Jurisdictional Waters</p>	<p><b>MM BIO-2a: Avoidance and Minimization Measures for Channel.</b> Applicant shall implement the following standard construction and post-construction measures to minimize impacts to the drainage channel in the Project area:</p> <ul style="list-style-type: none"> <li>• Use standard Best Management Practices (BMPs) to minimize impacts during construction.</li> <li>• Construction-related equipment shall be stored in upland areas, outside of the channel except as required by project design (restoration, trash removal, etc.).</li> <li>• Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Source control BMPs may include landscape planning, roof runoff controls, trash storage areas, use of alternative building materials, and education of future tenants and residents. Treatment control BMPs may include detention basins, vegetated swales (bio-swales), drain inlets, and vegetated buffers. Water quality BMPs shall be implemented throughout the project site to capture and treat contaminants.</li> <li>• To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed</li> </ul>	<p>S</p>	<p>LS</p>

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	<p>from site.</p> <ul style="list-style-type: none"> <li>• Employees shall strictly limit their activities, vehicles, equipment, and construction material to the proposed project footprint, staging areas, and designated routes of travel.</li> <li>• Construction limits shall be fenced with orange snow screen and exclusion fencing should be maintained until the completion of construction activities.</li> </ul> <p><b>Requirements and Timing:</b> This measure shall be printed on all drawings.  <b>Monitoring:</b> City staff shall confirm that measures are printed on all drawings and adhered to during construction.</p> <p><b>MM BIO-2b: Obtain USACE 404 Permit.</b> If any alterations of, or discharges into, waters of the United States, including Section 404 wetlands are proposed, these alterations must be in conformance with the Sections 404 and 401 of the CWA via certification and permitting prior to any grading or construction that may impact jurisdictional area(s), as applicable. Activities that usually involve a regulated discharge of dredged or fill materials include (but are not limited to) grading, placing of riprap for erosion control, pouring concrete, laying sod, preparing soil for planting (e.g., turning soil over, adding soil amendments), stockpiling excavated material, mechanized removal of vegetation, and driving of piles for certain types of structures. If avoidance of federally protected wetlands is not feasible, securing 404 and 401 permits under the Clean Water Act and compliance with the federal and state “no net loss of wetlands” policy will be required in accordance with USACE and RWQCB regulations. The terms and conditions of these permits are anticipated to require mitigation consistent with Compensatory Mitigation for Losses of Aquatic Resources; Final Rule (USACE, United States Environmental Protection Agency [EPA], Federal Register, April 10, 2008).</p> <p>Prior to initiation of ground disturbance activities within waters of the U.S., the applicant shall submit a jurisdictional delineation of waters of the U.S. to the USACE to request a formal verification of the limits of their jurisdiction and to identify potential impacts to waters of the U.S. If the USACE determines that jurisdictional waters of the U.S. will be impacted, the</p>		
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	<p>appropriate CWA Section 404 permit shall be acquired by the applicant for the construction of the development. In addition, the applicant shall be required to submit a Section 401 Water Quality Certification application to the Los Angeles RWQCB. If the USACE does not assert regulatory jurisdiction, then the applicant may be required to submit a Notice of Intent to the RWQCB for their General Permit R6T-2003-0004 for minor impact projects. If required, all regulatory permits will be obtained, and all conditions will be agreed upon to prior to project implementation. The applicant shall be responsible for complying with all conditions outlined in the applicable USACE, and/or RWQCB permit. Impact minimization measures associated with permit conditions of approval may include implementation of best management practices (i.e., erosion and sediment control measures) and seasonal work restrictions, as appropriate. Impacts to jurisdictional features shall not occur until the permits are received from the appropriate regulatory agencies, or correspondence is received from the agencies indicating that a permit is not required. <b>Requirements and Timing:</b> This measure shall be printed on all drawings. A Section 404 permit and Section 401 Water Quality Certification or Waiver shall be obtained prior to issuance of demolition or building permits for any portion of the development resulting in the discharge of dredged or fill material into the drainage. <b>Monitoring:</b> For developments resulting in the discharge of dredged or fill materials into the drainage in the Project area, City staff shall confirm that any required Section 404 permit and Section 401 Water Quality Certification or Waiver is obtained prior to issuance of demolition or building permits for the portion of the development impacting the jurisdictional drainage.</p> <p><b>MM BIO-2c: Consult CDFW on Section 1602 Requirements.</b> If waters of the State subject to CDFW's jurisdiction cannot be feasibly avoided, the applicant shall submit to CDFW a Section 1602 Notification regarding the potential need for a Lake and Streambed Alteration Agreement (LSAA) to authorize work in CDFW jurisdictional areas. If an LSAA is required, the applicant shall be responsible for complying with all conditions outlined in the LSAA, which may include wildlife habitat and streambed impact avoidance, minimization, and mitigation measures consistent with CDFW requirements for LSAAs. Impacts to development in Project areas subject to CDFW's jurisdiction shall not occur unless an LSAA is received from</p>		
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	<p>CDFW, correspondence is received indicating that an LSAA is not required, or the work is authorized by “operation of law” pursuant to the Fish and Game Code. <b>Requirements and Timing:</b> This measure shall be printed on all drawings. Prior to issuance of demolition or building permits for any portion of the development impacting areas subject to CDFW’s jurisdiction, either the applicant receives from CDFW an LSAA or correspondence that an LSAA is not required, or the work is authorized by “operation of law” pursuant to the Fish and Game Code. <b>Monitoring:</b> For developments disturbing areas subject to CDFW’s jurisdiction, City staff shall confirm that an LSAA has been obtained, if required, prior to issuance of demolition or building permits for those portions of the development subject to CDFW’s jurisdiction.</p> <p><b>MM BIO-2d: Habitat Mitigation Plan.</b> Preparation of a habitat mitigation plan may be required by the CDFW as part of an LSAA process or by the USACE and the RWQCB for permitting of discharges to waters of the United States, if required. The mitigation plan would address protection measures for the jurisdictional drainage and any protected trees retained onsite, quantify the total acreage of impacts to each sensitive resource, describe creation/replacement ratio for acres impacted (typically at least 1:1), identify potential mitigation sites, provide a planting plan, and outline monitoring and maintenance requirements. The amount of compensatory acreage shall be based on the functions and values of the impacted drainage and riparian habitat. If required, the plan would be prepared by a qualified biologist pursuant to, and through consultation with, CDFW. As an alternative, equivalent mitigation credits may be purchased at a mitigation bank to offset impacts to jurisdictional resources. The mitigation plan would provide detailed information about the bank and how the purchase of credits will result in no net loss of these protected resources. Purchase of mitigation credits would be subject to approval and verification by CDFW.</p> <p><b>Requirements and Timing:</b> Measure shall be printed on all drawings. If required by the permitting resource agencies (i.e., USACE, RWQCB, or CDFW), a Habitat Mitigation Plan shall be prepared and approved by the City and other responsible natural resource agencies prior to issuance of demolition or building permits for the portion of the development impacting the drainage. <b>Monitoring:</b> City staff and the City Engineer shall review and approve of the Habitat Mitigation Plan, if one is required by resource</p>		
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	agencies, prior to issuance of demolition or building permits for the portion of the development impacting the drainage.		
Impact BIO-3 Impact on Sensitive Natural Vegetation Communities	Refer to mitigation measures BIO-2a through BIO-2d.	S	LS
Impact BIO-4 Impact on Wildlife Corridors	NA	LS	NA
Impact BIO-5 Impact on Other Special-Status Species	NA	LS	NA
Impact BIO-6 Conflict with Local Policies or Ordinances or Conservation Plans	<b>SC BIO-1:</b> Compliance with the City of Monrovia Oak Tree Preservation Ordinance (87-11), Municipal Code Section 17.20.40 is required for disturbance to protected coast live oak trees that are greater than or equal to 10" in diameter at least 2 feet above the ground. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings. Any planned removal or encroachment upon oak trees shall be shown on proposed demolition plans, site plans and grading plans, including the number and size of each oak tree, as well as the limits of the dripline of each oak tree. <b>Monitoring:</b> City staff shall review and approve the demolition plans, site plans and grading plans prior to issuance of any demolition, grading and building permits to confirm that the Oak Tree Preservation Ordinance is adhered to.	LS	LS
<b>Cultural Resources and Tribal Cultural Resources</b>			
Impact CUL-1 Historic Structures	NA	LS	NA
Impact CUL-2 Archaeological Resources	<b>MM CUL-1. Conduct Archaeological Sensitivity Training for Construction Personnel.</b> The applicant shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall include a handout and focus on how to identify archaeological resources that may be encountered during earthmoving activities; the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified	S	LS

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	<p>professional archaeologist would follow in conducting a salvage investigation, if one is necessary. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings and grading plans. The archaeologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM CUL-2. Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered.</b> If archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior’s Professional Qualifications and Standards. Should the newly discovered artifacts be determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated. The applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings and grading plans. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM CUL-3. Conduct Periodic Archaeological Resources Spot Checks during grading and earth-moving activities in Younger Alluvial Sediments.</b> The applicant shall retain a qualified professional archaeologist, who meets the U.S. Secretary of the Interior’s Professional Qualifications and Standards to conduct periodic Archaeological Spot</p>		
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	<p>Checks beginning at depths below three (3) feet to determine if construction excavations have exposed or have a high probability of exposing archaeological resources. After the initial Archaeological Spot Check, further periodic checks will be conducted at the discretion of the qualified archaeologist. If the qualified archaeologist determines that construction excavations have exposed or have a high probability of exposing archaeological artifacts, ongoing construction monitoring for archaeological resources will be required. For the ongoing monitoring, the applicant shall retain a qualified archaeological monitor and Native American monitor, who will work under the guidance and direction of a professional archaeologist, who meets the qualifications set forth by the U.S. Secretary of the Interior's Professional Qualifications and Standards. The archaeological monitor and Native American monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into non-fill younger Pleistocene alluvial sediments. Multiple earth-moving construction activities may require multiple archaeological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring can be reduced to part-time inspections as directed by the Project archaeologist.</p> <p><b>Requirements and Timing:</b> This measure shall be printed on all construction drawings and grading plans. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM CUL-4. Prepare Report Upon Completion of Monitoring Services.</b> The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the applicant, the South Central Coastal Information Center, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of construction activities and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and</p>		
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	CEQA, and treatment of the resources. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings. An archaeological monitoring report shall be prepared and submitted for City review and approval prior to final sign off on construction. <b>Monitoring:</b> City staff shall review and approve the archaeological monitoring report prior to final sign off on construction.		
Impact CUL-3 Human Remains	<b>MM CUL-5. Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered.</b> If human remains are unearthed during construction, the City of Monrovia and the applicant shall comply with State Health and Safety Code Section 6050.5. The City of Monrovia and the applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, of the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of reburial with the NAHC and the Project archaeologist shall file a record of the reburial with the CHRIS-SCCIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings and grading plans. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.	S	LS
Impact CUL-4 Tribal Cultural Resources	Refer to mitigation measures MM CUL-1 through MM CUL-5.	S	LS

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<b>Geology and Soils</b>			
Impact GEO-1 Seismic Hazards	<p><b>MM GEO-1.</b> Prior to the issuance of grading and building permits for all proposed development, the applicant shall retain a California registered and licensed geotechnical engineer to prepare a Geotechnical Report to provide construction and design recommendations for the proposed facilities to withstand probable seismically induced ground shaking. The Geotechnical Report shall provide specific recommendations for structural foundations and specifications and procedures for grading, including the suitability of onsite materials for use as fill. All grading, drainage, and building plans shall include all recommendations of the final Geotechnical Report for the development. <b>Requirements and Timing:</b> The Geotechnical Report shall be reviewed and approved by the City Department of Public Works prior to issuance of grading and permits. In addition, the geotechnical engineers for the development shall sign a title block on the grading, drainage, and building plans stating that the recommendations of the development's Geotechnical Report have been followed in the approved plans that he or she is signing. <b>Monitoring:</b> City Department of Public Works staff shall review and approve of the Geotechnical Report, and that grading, drainage, and building plans are signed by the geotechnical engineer, prior to issuance of grading and building permits.</p>	S	LS
Impact GEO-2 Erosion	NA	LS	NA
Impact GEO-3 Landslides, Subsidence, and Liquefaction	NA	LS	NA
Impact GEO-4 Expansive Soils	NA	LS	NA
Impact GEO-5 Septic Tanks or Alternative Wastewater Disposal	NA	LS	NA
Impact GEO-6 Paleontological Resources	<p><b>MM GEO-2. Conduct Paleontological Sensitivity Training for Construction Personnel.</b> The applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training shall include a handout and shall focus on how to</p>	S	LS

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	<p>identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary. <b>Requirements and Timing:</b> This measure shall be printed on all grading and construction drawings. The paleontologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM GEO-3. Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities.</b> The applicant shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct periodic Paleontological Spot Checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks shall be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources shall be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth- moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if directed by the qualified professional paleontologist. <b>Requirements and Timing:</b> This</p>		
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	<p>measure shall be printed on all grading and construction drawings. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM GEO-4. Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.</b> If paleontological resources and/or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. <b>Requirements and Timing:</b> This measure shall be printed on all grading and construction drawings. <b>Monitoring:</b> City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.</p> <p><b>MM GEO-5. Report Upon Completion of Monitoring Services.</b> Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of construction and required mitigation measures. <b>Requirements and Timing:</b> This measure shall be printed on all construction drawings. An archaeological monitoring report shall be prepared and submitted for City review and approval prior to final sign off</p>		
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	on construction. <b>Monitoring:</b> City staff shall review and approve the archaeological monitoring report prior to final sign off on construction.		
<b>Greenhouse Gas Emissions and Energy Consumption</b>			
Impact GHG-1 Generation of Greenhouse Gas Emissions	NA	LS	NA
Impact GHG-2 Plan Consistency	NA	LS	NA
Impact GHG-3 Energy Consumption	NA	LS	NA
<b>Hazards and Hazardous Materials</b>			
Impact HAZ-1 Hazardous Materials Management	NA	LS	NA
Impact HAZ-2: Hazardous Waste	<p><b>MM HAZ-1:</b> To the extent required under law based on the concentrations detected at the Project, the Department of Toxic Substances Control (DTSC), or another regulatory agency delegated authority by DTSC to investigate and remediate the contaminated property (i.e., the Los Angeles County Fire Department’s Health Hazardous Materials Division’s Site Mitigation Unit) (herein referred to as designee), shall be notified of the results of the Phase I Environmental Site Assessments (ESA) and Phase II (ESA) prepared for the Alexan Foothills Specific Plan. All requirements of DTSC, or its designee, shall be complied with prior to issuance of grading and demolition permits for the portion of the development subject to CERCLA or California Health and Safety Code Division 20, Chapter 6.8. The TBA-impacted soil will be excavated for off-site disposal at a licensed disposal facility, in accordance with all applicable laws. In addition, soil sampling will be performed in the vicinity of the trichlorofluoromethane impacts to soil vapor and, if the source of trichlorofluoromethane in soil is identified, the trichlorofluoromethane-affected soil will also be excavated for off-site disposal at a licensed disposal facility, in accordance with all applicable laws. <b>Requirements and Timing:</b> The measures specified above shall be performed prior to grading and demolition in the portions of the development subject to CERCLA or California Health and Safety Code</p>	S	LS

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	<p>Division 20, Chapter 6.8 <b>Monitoring:</b> To the extent that contaminant concentrations are detected at levels exceeding prescribed volumetric thresholds, prior to issuance of grading and demolition permits for any portion of the development subject to CERCLA or California Health and Safety Code Division 20, Chapter 6.8, City staff shall obtain documentation that DTSC, or its designee, signs off and approves of the development to commence grading and demolition.</p> <p><b>MM HAZ-2.</b> Prior to receipt of land use clearance for developments involving ground disturbance in ZCA Area A and C, a Phase I Environmental Site Assessment (ESA) must be performed in accordance with ASTM standards to determine the potential for contamination at the project site and need for further investigation or cleanup. If results of the Phase I ESA conclude that a subsurface investigation is warranted, a Phase II ESA shall be performed to further determine the nature and extent of contamination. If contaminants are detected at levels exceeding applicable prescribed volumetric thresholds, the reports shall be forwarded to the DTSC, or another regulatory agency delegated authority by DTSC to investigate and remediate the contaminated property (e.g., the Los Angeles County Fire Department’s Health Hazardous Materials Division’s Site Mitigation Unit) (herein referred to as designee). If a Phase II ESA is required by DTSC or designee, all requirements of DTSC, or its designee, shall be complied with prior to issuance of grading and demolition permits for the portion of the development subject to CERCLA and the California Health and Safety Code. <b>Requirements and Timing:</b> The measures specified above shall be performed prior to grading and demolition in the portions of the development subject to CERCLA and California Health and Safety Code Division 20, Chapter 6.8. <b>Monitoring:</b> Prior to issuance of grading and demolition permits for any portion of the development subject to CERCLA and California Health and Safety Code, City staff shall obtain documentation that DTSC, or its designee, signs off and approves of the development to commence grading and demolition.</p> <p><b>MM HAZ-3.</b> Prior to demolition of structures older than 1950 in the Project area, a survey for lead-based paint (LBP) and asbestos containing material (ACM) shall be performed. Prior to issuance of building permits, copies of the survey report(s) shall be submitted to the City of Monrovia for review</p>		
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	and sign off. Prior to the start of construction, the Project Applicant shall provide the City with copies of all notifications submitted to the South Coast Air Quality Management District (SCAQMD) for proposed demolition, as well as documentation of agency sign off on any abatement activities completed. <b>Requirements and Timing:</b> A LBP and ACM survey report shall be submitted to the City for review and approval prior to issuance of building permits. Notifications shall also be submitted to the SCAQMD prior to issuance of building permits. Documentation of signoff by the SCAQMD on any abatement activities performed shall be provided prior to City sign off on construction. <b>Monitoring:</b> City staff shall review and approve of LBP and ACM reports and shall confirm notifications are made to the SCAQMD prior to issuance of building permits. City staff shall confirm that the SCAQMD has signed off on any abatement activities prior to City sign off on construction.		
Impact HAZ-3 Radiofrequency Radiation	NA	LS	NA
Impact HAZ-4 Airports	NA	LS	NA
<b>Hydrology</b>			
Impact HYD-1 Surface Hydrology and Water Quality	<p><b>SC HYD-1:</b> Based upon the requirements of the City's Stormwater Management Ordinance, MMC 12.36 and the Los Angeles County Municipal Storm Water National Pollutant Discharge Elimination System (MS4 NPDES) Permit issued by California Regional Water Quality Control Board, Los Angeles Region, the following shall be incorporated into development applications:</p> <ul style="list-style-type: none"> <li>Minimize impacts from storm water runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under the California Environmental Quality Act (California Public Resources Code Section 21100), Section 13369 of the California Water Code, Sections 319, 402(p), and 404 of the Clean Water Act, Section 6217(g) of the Coastal Zone Act Reauthorization Amendments, Section 7 of the Environmental Protection Act, and local governmental ordinances.</li> </ul>	LS	NA

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	<ul style="list-style-type: none"> <li>• Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground.</li> <li>• Minimize the amount of storm water directed to impermeable surfaces.</li> <li>• Minimize pollution emanating from parking lots through the use of appropriate treatment control using best management and good housekeeping practices.</li> <li>• The applicant shall integrate Best Management Practices to ensure compliance with NPDES guidelines and the City’s Stormwater Management Ordinance, MMC 12.36 to the satisfaction of the City Engineer, prior to the issuance of the grading permit. The design, implementation, construction activities and maintenance of the management devices shall mitigate and reduce pollutants in storm water discharges to the maximum extent practicable and shall be identified as on a “site specific mitigation plan.” Site Specific Mitigation Plan must specifically address and provide best management practices (BMPs) either structural or non-structural to mitigate pollutants.</li> <li>• The applicant or any successor in interest shall conduct annual maintenance inspections by the manufacturer or by a City approved inspector of all structural and/or treatment control storm water devices by following best management practices which shall also verify the legibility of all required stencils and signs which shall be repainted and labeled as necessary. Proof of such inspection shall be retained by the applicant or any successor in interest and a copy submitted to the City of Monrovia on a yearly basis.</li> </ul>		
Impact HYD-2 Flooding and Other Hydrologic Hazards	NA	LS	NA
<b>Land Use and Planning</b>			
Impact LUP-1 Physically Divide an Established Community	NA	LS	NA

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MM = Mitigation Measure  
 SC = Standard Condition



Impact LUP-2 Conflict with any Applicable Land Use Plan, Policy, or Regulation	NA	LS	NA
<b>Noise and Vibration</b>			
Impact NOI-1: Exposure to or Generation of Noise Levels that Exceed Standards	<p><b>MM NOI-1: Confirm Compliance with Applicable Interior Noise Standard Requirements.</b> Prior to the issuance of a building permit for any development in the Project area, the City shall review and approve an acoustical analysis, prepared by or on behalf of the applicant, and based on the final design, that:</p> <ol style="list-style-type: none"> <li>1) Identifies the exterior noise levels at:                             <ol style="list-style-type: none"> <li>a. Exterior building facades that face West Evergreen Avenue/I-210, South Magnolia Avenue, and the Metro Gold Line ROW; and</li> <li>b. Exterior recreation areas, including patios, that face and have a line of sight to West Evergreen Avenue/I-210, South Magnolia Avenue, and the METRO Gold Line ROW.</li> </ol> </li> <li>2) Identifies the final site and building design features that would:                             <ol style="list-style-type: none"> <li>a. Attenuate exterior building façade noise levels to interior levels that do not exceed 45 CNEL in habitable rooms and 50 dBA Leq (1-hour) in other occupied rooms. Potential noise insulation site and building design features capable of achieving this requirement may include, but are not limited to:                                     <ul style="list-style-type: none"> <li>• Sound barriers</li> <li>• Enhanced exterior wall construction/noise insulation design</li> <li>• Use of enhanced window, door, and roof assemblies with above average sound transmission class (STC) or outdoor/indoor transmission class (OITC) values</li> <li>• Use of mechanical, forced air ventilation systems to permit a windows closed condition in residential units.</li> </ul> </li> </ol> </li> </ol> <p><b>Requirements and Timing:</b> An acoustical report shall be submitted to City Planning for review and approval prior to the issuance of building permits, documenting that actual interior and exterior noise level at the locations</p>	S	LS

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 NA = Not applicable

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	indicated in this measure, meet City and State standards. <b>Monitoring:</b> City staff shall approve the acoustical analysis prior to issuance of building permits.		
Impact NOI-2: Substantial Permanent Increases in Ambient Noise Levels	NA	LS	NA
Impact NOI-3: Substantial Temporary or Periodic Increases in Ambient Noise Levels	<p><b>MM NOI-2:</b> To reduce temporary construction noise impacts on adjacent land uses, the applicant or the applicant’s construction contractor shall implement the following construction-period noise abatement measures for any development within the Project area:</p> <ul style="list-style-type: none"> <li>• <i>Construction Activity Notification.</i> All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule for the proposed development. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can enquire about the construction process and register complaints.</li> <li>• <i>Noise Disturbance Coordinator.</i> A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.</li> <li>• <i>Construction Traffic.</i> Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.</li> <li>• <i>Equipment Noise Controls:</i> The applicant and/or its construction contractor shall implement the following equipment noise control</li> </ul>	S	LS

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	<p>measures during all phases of construction:</p> <ul style="list-style-type: none"> <li>○ <i>Mufflers.</i> All construction equipment shall be equipped with muffles and other suitable noise attenuation devices (e.g., engine shields).</li> <li>○ <i>Equipment Selection.</i> Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), to the maximum extent feasible.</li> <li>○ <i>Provide Electric Hook-Ups.</i> If feasible, electric hook-ups shall be provided to avoid the use of generators. If electric service is determined to be infeasible for the site, only whisper-quiet generators shall be used (i.e., inverter generators capable of providing variable load</li> </ul> <ul style="list-style-type: none"> <li>● <i>Temporary Barriers.</i> During all demolition and construction activities, one or more physical barriers capable of achieving a minimum reduction in predicated noise levels by 11 dB shall be installed between future development and Magnolia Avenue and Mayflower Avenue, and between the western boundary of the Alexan Foothills Specific Plan and ZCA Area A. Potential options for achieving this level of attenuation can include, but are not limited to:             <ul style="list-style-type: none"> <li>○ A concrete, wood, or other barrier installed at-grade (or mounted to structures located at-grade, such as K-Rail) along the property line. Such a wall/barrier shall consist of material that has a minimum rated transmission loss value of 21 dB (or equivalent rating) and shall contain no gaps in the structure through which noise may pass.</li> <li>○ Commercially available acoustic panels or other products such as acoustic barrier blankets installed along the property line, building envelope or, if feasible and necessary, at or near sensitive residential receptor areas.</li> <li>○ Any combination of noise barriers and commercial products capable of achieving an 11-dB reduction in construction noise levels at sensitive receptor locations.</li> </ul> </li> </ul> <p><b>Requirements and Planning:</b> This measure shall be printed on all construction drawings and included in construction contracts. <b>Monitoring:</b> City staff shall ensure that this measure is located on final construction</p>		
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	drawings. City staff shall conduct inspections during construction to ensure that measures are implemented.		
Impact NOI-4: Expose People to or Generate Excessive Groundborne Vibration or Noise	NA	LS	NA
Impact NOI-5: Airport-related Noise Levels	NA	LS	NA
<b>Population and Housing</b>			
Impact POP-1: Induce Substantial Unplanned Population Growth	NA	LS	NA
Impact POP-2: Displace People or Housing	NA	LS	NA
<b>Public Services and Recreation</b>			
Impact PS-1: Fire Services	<b>SC PS-1:</b> Prior to the issuance of building permits, a Project applicant shall pay a fire impact fee, as required by Municipal Code Section 3.46.040, Schedule of Fees and Service Charges, or a CFD shall be established along with the approval of the special tax set at the amount established by the City. This fee shall either be paid directly to the City, be incorporated into a Communities Facilities District (CFD) fee to be paid by the applicant. <b>Requirement and Timing:</b> Development impact fees shall be paid to the City, or the establishment of the CFD along with the approval of the special tax set at the amount established by the City shall occur prior to issuance of building permits. <b>Monitoring:</b> City staff shall confirm payment of development impact fees or the establishment of the CFD and approval of the special tax have occurred prior to issuance of building permits.	LS	LS
Impact PS-2: Police Services	NA	LS	NA

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Impact PS-3: School Services	<b>SC PS-2:</b> Prior to the issuance of building permits, the applicant shall pay school facility development impact fees to the Monrovia Unified School District. Proof of payment shall be provided to the City of Monrovia. <b>Requirement and Timing:</b> Development impact fees shall be paid prior to issuance of building permits. <b>Monitoring:</b> City staff shall confirm payment of development impact fees prior to issuance of building permits.	LS	LS
Impact PS-4 Parks and Recreation	<b>MM PS-1: Parkland Dedication Fee.</b> Prior to the issuance of building permits, the applicant shall pay an in-lieu park impact fee to provide for parkland resources consistent with General Plan policy of three acres of parkland per 1,000 residents, or a CFD shall be established along with the approval of the special tax set at the amount established by the City. This fee either shall be paid directly to the City or shall be incorporated into a Community Facilities District fee to be paid by the applicant. <b>Requirement and Timing:</b> The in-lieu fee shall be paid to the City, or the establishment of the CFD along with the approval of the special tax set at the amount established by the City shall occur prior to issuance of building permits. <b>Monitoring:</b> City staff shall confirm payment of the in-lieu fee or the establishment of the CFD and the approval of the special tax prior to issuance of building permits or the recording of the final parcel map.	S	LS
Impact PS-5 Library Services	NA	LS	NA
Impact PS-6 Wildfire Management	NA	LS	NA
<b>Transportation and Circulation</b>			
Impact T-1 Alexan Foothills Specific Plan Intersection Analysis	<b>MM T-1:</b> The City of Monrovia has conducted an Area Traffic Study and is devising a Development Impact Fee (DIF) program to address the cumulative effects of major development projects on the transportation system in the vicinity of the Monrovia Gold Line Station. The DIF will include each project's fair share cost of the traffic study and the recommended mitigation measure(s) identified for that project's specific impact(s). If the City Council adopts the DIF, it shall be paid prior to recording the Final Map or the amount of the DIF included in the bonds. Payment or bonding of the DIF shall fully satisfy the project's mitigation obligation for those improvements covered by the DIF. If the City Council does not adopt a DIF	S	LS

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|---|-------------------------|
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| LS = Less than significant              | SC = Standard Condition |
| SU = Significant and unavoidable impact |                         |
| NA = Not applicable                     |                         |

	but does approve an Area Traffic Study that commits future applicants to pay fair share fees and obligates the City to spend those fees on specified improvements, the project will not pay a DIF, but will be responsible for their fair share as a fee in-lieu of improvements for mitigating the specific impacts identified in the project's Traffic Study. <b>Requirements and Timing:</b> The costs of those improvements or fee-in-lieu-of mitigation shall be paid prior to the Final Map recording, or a bond equal to the determined amount shall be posted prior to the Final Map recording. <b>Monitoring:</b> City staff shall confirm payment of either the costs of those improvements or fee-in-lieu of mitigation prior to recordation of the Final Map.		
Impact T-2 Alexan Foothills Specific Plan Ramp Intersection Analysis	Refer to mitigation measure MM T-1 above.	LS	NA
Impact T-3 Full Project Road Segment Analysis	NA	LS	NA
Impact T-4 Off-Ramp Queuing Analysis	NA	LS	NA
Impact T-5 Alternative Mobility Modes	NA	LS	NA
Impact T-6 Consistency with CEQA Guidelines Section 15064.3(B)	NA	LS	NA
Impact T-7 Hazards and Emergency Access	NA	LS	NA
<b>Utilities and Service Systems</b>			
Impact UT-1 Wastewater Collection and Treatment	<b>MM UT-1.</b> Prior to issuance of building permits or the approval of a final map, whichever occurs first, the applicant shall agree to the conditions as outlined herein and provide the following: a) provide a "Can and Will Serve" letter by the City of Monrovia's Department of Public Works to provide wastewater service to the development indicating the feasibility and conditions of providing service to the development, and b) identify and show on the site plans and tentative map the proposed layout and design of the	S	LS

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	development and how it will accomplish City Department of Public Works' conditions of approval for the development. <b>Requirements and Timing:</b> A Can and Will serve letter for wastewater service shall be obtained prior to issuance of building permits or approval of a final map, whichever occurs first. <b>Monitoring:</b> City staff shall confirm issuance of the Can and Will Serve letter for wastewater service prior to issuance of building permits or approval of a final map, whichever occurs first.		
Impact UT-2 Water Supply and Groundwater Resources	<p><b>MM UT-2.</b> The applicant for development shall pay fair-share in-lieu fees for completion of upgrades to the nearby water system to support the development. Improvements will include the addition of one booster pump and upgrade of 980 feet of pipeline along Magnolia Avenue between Duarte Road and Evergreen Avenue. <b>Requirement and Timing:</b> In lieu fees shall be paid prior to issuance of building permits. <b>Monitoring:</b> City staff shall confirm payment of in lieu fees prior to issuance of building permits.</p> <p><b>MM UT-3.</b> Prior to issuance of building permits or the approval of a final map, whichever occurs first, the applicant shall agree to the conditions as outlined herein and provide the following: a) provide a "Can and Will Serve" letter by the City of Monrovia's Department of Public Works to provide water service to the development indicating the feasibility and conditions of providing service to the development, and b) identify and show on the site plans and tentative map the proposed layout and design of the development and how it will accomplish City Department of Public Works' conditions of approval for the development. <b>Requirements and Timing:</b> A Can and Will serve letter for water service shall be obtained prior to issuance of building permits or approval of a final map, whichever occurs first. <b>Monitoring:</b> City staff shall confirm issuance of the Can and Will Serve letter for water service prior to issuance of building permits or approval of a final map, whichever occurs first.</p>	S	LS
Impact UT-3 Solid Waste	<b>SC UT-1:</b> Applicants shall comply with the City of Monrovia Construction and Demolition (C&D) Disposal and Recycling Program. The Program includes submitting a C&D Recycling Program Permit Application and a Waste Management Plan to the Public Works Department Environmental Services Division and diverting 50 percent of the total construction and demolition debris generated by the development. <b>Requirements and</b>	LS	LS

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	<p><b>Timing:</b> Applicants shall submit Waste Management Plans to the City Department of Public Works Environmental Services Division for review and approval prior to issuance of demolition permits. The Waste Management Plan shall be implemented and adhered to throughout construction.</p> <p><b>Monitoring:</b> City Department of Public Works Environmental Services Division shall review and approve of Waste Management Plans prior to issuance of demolition permits; City staff shall confirm approval of the Waste Management Plan prior to issuance of building permits and shall confirm compliance with the Waste Management Plan prior to sign off on construction.</p>		
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## **2.4 SUMMARY OF ALTERNATIVES**

To provide a basis for further understanding of the environmental effects of a proposed Project and possible approaches to reducing its identified significant impacts, the CEQA Guidelines require an EIR to also "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Chapter 21 identifies and evaluates the following three alternatives to the Project:

### **2.4.1 Identified Alternatives**

#### **Alternative 1: No Project**

According to Section 15126.6(e)(2) of the CEQA Guidelines, the evaluation of alternatives in an EIR shall include a "no project" scenario. A "no project" scenario consists of the existing physical setting and "...what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

Under Alternative 1: No Project, the GPA nor ZCA would not occur, and the Alexan Foothills Specific Plan would not be adopted. The Project area would continue with a land use designation of Manufacturing under the City's Land Use Element. This land use designation allows for light manufacturing and limited heavy manufacturing uses. Additionally, under the current zoning, the entire Project area would continue to be designated as Manufacturing where industrial uses are allowed in this zone (with some uses requiring a conditional use permit). Office and institutional uses are also allowed in this zone, with the exception of cemeteries and government buildings. Under this zoning, the only residential uses that are allowed are mobile home parks with a conditional use permit.

Under this alternative, no buildout would occur in the Alexan Foothills Specific Plan area and all existing structures would remain. Specifically, three light industrial structures, one legal non-conforming residential unit, one religious building and associated trailers, one commercial office building, and one asphalt covered storage lot, all constructed between 1942 and 1987, would remain.

Alternative 1 would not incorporate the smart growth guiding principles or objectives of the proposed Project directed at developing a sustainable community by increasing walkability and accessibility for bicyclists, providing a greater range of transportation and housing choices through transit oriented development and mixed-use development, and prioritizing infill and redevelopment rather than development of open space. These guiding principles and objectives help mitigate overall impacts on air quality, global climate change, and transportation and circulation within the City. Also, existing structures would remain on the property and would therefore not include current techniques in achieving sustainability such as modern fixtures for water conservation and use of green building technology.

## **Alternative 2: Buildout of Alexan Foothills Specific Plan Area Under Current Zoning**

Alternative 2 would involve a slight variation of the “no project” scenario presented under Alternative 1, whereby the Alexan Foothills Specific Plan area would be built out under existing land use and zoning.

Under this alternative, exactly as under Alternative 1, the GPA and ZCA would not occur. The Project area would continue with a land use designation of Manufacturing under the City’s Land Use Element. This land use designation allows for light manufacturing and limited heavy manufacturing uses. Additionally, under the current zoning, the entire Project area would continue to be designated as Manufacturing where industrial uses are allowed in this zone (with some uses requiring a conditional use permit). Office and institutional uses are also allowed in this zone, with the exception of cemeteries and government buildings. Under this zoning, the only residential uses that are allowed are mobile home parks with a conditional use permit.

Under this alternative, the 6.77-acre property proposed for the Alexan Foothills Specific Plan could be built out under the current Manufacturing land use designation and zone. Under this alternative, incremental development of manufacturing, office, and residential uses could still occur within the entire Project area under the existing land use designation and zoning. The current land uses within this area include a mix of light industrial, warehouse/storage, office, single family residential, private surface parking, and two cellular towers. Development of a limited number of mobile homes could be developed in the Project area, but much less than the 518 residential units possible under the Project because mobile homes are one-story structures. Development of the area would likely primarily involve remodels or demolition and rebuild of industrial or office uses.

Alternative 2 would not incorporate the smart growth guiding principles or objectives of the Project directed at developing a sustainable community by increasing walkability and accessibility for bicyclists, providing a greater range of transportation and housing choices through transit oriented development and mixed-use development, and prioritizing infill and redevelopment rather than development of open space. These guiding principles and objectives help mitigate overall impacts on air quality, global climate change, and transportation and circulation within the City.

Under Alternative 2, Objective 1, to achieve a residential density of 54 units per acre in the Project area, would not be met. Other Project objectives could be met under future proposals but likely not as well given the Manufacturing land use designation and zone. For example, future developments in the Manufacturing zone could still implement pedestrian and accessibility improvements, which would fulfill Objectives 3 and 4, but these kinds of improvements are more-often associated with residential and retail development. New manufacturing development also has the potential to improve the aesthetic appeal of the area, fulfilling Objective 5, though manufacturing project design typically focuses more on function than aesthetics.

Alternative 2 may not necessarily result in less overall development as the Project as well. Development of industrial or office uses of the same or greater size would still be feasible in the Project area under this alternative, especially if the property currently held by Trammell Crow Residential is sold to one owner.

### **Alternative 3: Reduced Project**

Alternative 3 would involve development of 400 multi-family residential units in ZCA Area B under the Alexan Foothills Specific Plan. Under this alternative, 36 units would be subtracted from the top floor of the apartment complex to minimize the height of the buildings.

Under this alternative, Project amenities would remain such as the bike repair shop, swimming pools, public plazas and rooftop decks. However, the parking garage would be scaled back in size commensurate with the reduction in 36 residential units, and no public parking for METRO's Monrovia Gold Line Station would be provided.

Square footages and heights of new structures in the 6.77-acre Alexan Foothills Specific Plan area would be reduced; however, they would likely continue to be multi-story buildings given the size of the property.

Under a Reduced Project alternative, only the minimum project objectives would be met and several project features would be reduced.

#### **2.4.2 Environmentally Superior Alternative**

The CEQA Guidelines (Section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Alternative 1 would result in the least environmental impacts but would not meet any of the Project objectives. Alternative 2 would likely result in equal or greater impacts to most issue areas than the Project, with the exception of public services and recreation and utilities.

Alternative 3 would involve an overall lower level of development and would meet the Project objectives, but to a lesser extent than the Project. Alternative 3 would, therefore, be the environmentally superior alternative. This alternative, however, would only result in a slight reduction in building square footages, site coverage, and number of vehicle trips compared with the Project, resulting in similar impacts on most issue areas with the exception of public services and recreation and utilities where there would be clearly less impacts. In addition, under Alternative 3, less housing would occur, resulting in a greater impact on population and housing and land use and planning due to the current deficit of housing in California. Alternative 3 would be less effective at meeting the goals of the City's Housing Element. In addition, the benefits associated with maximizing in-fill residential development, increasing transit oriented development, and increasing mixed uses would be less under Alternative 3 than the Project. This would result in less benefits to air quality, greenhouse gas emissions, and noise under Alternative 3 compared with the Project. Therefore, Alternative 3 is identified as the Environmentally Superior Alternative.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
ASTM	American Society for Testing and Materials
BMPs	Best Management Practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHRIS-SCCIC	South Central Coastal Information Center
CNEL	Community Noise Equivalent Level
CRP	Coating Restriction Plan
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	Decibels
dBA	Decibels, A-Weighted
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
GPA	General Plan Amendment
GP/ZCA	General Plan and Zoning Code Amendment
LBP	lead-based paint
LSAA	Lake and Streambed Alteration Agreement
METRO	Los Angeles County Metropolitan Transportation Authority
MLD	most likely descendent
MS4 NPDES	Municipal Storm Water National Pollutant Discharge Elimination System
NAHC	Native American Heritage Center
NOP	Notice of Preparation
OITC	Outdoor/Indoor Transmission Class
PD	Planned Development
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
STC	Sound Transmission Class
USACE	U.S. Army Corps of Engineers
VOC	volatile organic compound
ZCA	Zoning Code Amendment

## **3. PROJECT DESCRIPTION**

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### **3.1 BACKGROUND**

The City of Monrovia (City) is proposing a new Planned Development Area (PD-27: Station Square West) within a 9.63-acre Project area. Within this Project area, a General Plan Amendment (GPA) and Zoning Code Amendment (ZCA) are proposed. In addition, the-Alexan Foothills Specific Plan (Specific Plan) is proposed for a 6.77-acre portion of the ZCA area.

Under California law (Government Code Section 65300 et seq.), every City and County is required to have a General Plan that functions as the overarching, comprehensive, and long-range policy document for land use planning. For cities, the General Plan guides the physical development of the incorporated City and any land outside City boundaries (i.e., City limits) that has a relationship to the City's future growth and development. A City's Zoning Code contains development standards to ensure that buildout of the City is consistent with General Plan policies and objectives.

Specific Plans identify the long-term vision and objectives for private development and public improvements within a specified planning area. A Specific Plan establishes land use, transportation, infrastructure, and urban design strategies to provide opportunities for local commercial and residential uses to thrive.

### **3.2 PROJECT LOCATION AND ENVIRONMENTAL SETTING**

The City of Monrovia (City) is in the San Gabriel Valley region of Los Angeles County. The Project area comprises one City block on approximately 9.63 acres (Figure 3-1). The block is bounded by West Evergreen Avenue to the north, South Magnolia Avenue to the east, South Mayflower Avenue to the west, and the METRO Gold Line light rail to the south. The Project area is located primarily within an urbanized industrial area.

#### **General Plan Amendment Area**

The GPA area encompasses the entire Project area. Current land uses within the 9.63-acre GPA area include a mix of residential, industrial, and institutional uses, which are described in more detail below under the Zoning Code Amendment area heading.

#### **Zoning Code Amendment Area**

The ZCA area encompasses the same 9.63 acres as the GPA area.

The Project area is currently developed with a mix of light industrial (approximately 70,750 square feet) and warehouse (approximately 10,120 square feet) uses with five single-family residences, an institutional place of worship (approximately 6,630 square feet), and an office. The Project area also contains private surface parking throughout and two cellular towers.

Three areas have been defined with the ZCA area, referred to as Areas A, B, and C (Figure 3-2), which are described as follows:

- Area "A" encompasses 2.30 acres in the western portion of the Project area where there is a mix of residential and commercial/industrial buildings;

- Area “B” encompasses the middle 6.77-acre portion. This area is developed with three light industrial structures, one residential unit, the institutional place of worship and associated trailers, the commercial office building, and one asphalt covered storage lot, all constructed between 1942 and 1987. The following parcels are within the Alexan Foothills Specific Plan boundaries (Assessor Parcel Numbers [APNs] 8507-006-016, -022, -024, -035, -041, -042, -043, and -044); and
- Area “C” encompasses 0.56 acres in the northeastern portion of the Project area and is developed with three commercial/industrial buildings.

### **3.3 TRANSIT PRIORITY AREA**

The proposed GPA, ZCA, and Alexan Foothills Specific Plan qualify as a “Transit Priority Area (TPA)” as defined in Section 21099(a)(7) of CEQA, as well as a “High Quality Transit Area” (HQTA) defined by the Southern California Association of Governments (SCAG) in their 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016). TPAs and HQTAs are defined as areas within one-half mile of a major transit stop that are existing or planned where a “major transit stop” is a “site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods” (Section 21064.3 of CEQA).

TPAs and HQTAs are areas where people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life (SCAG 2016). High density development in TPAs and HQTAs result in increased ridership on important public transit and result in increased pedestrian and bike infrastructure. Housing near transit helps to increase connectivity to employment opportunities and reduce reliance on automobile ownership. HQTAs account for only three percent of total land area in SCAG region and two percent of the developable land in the region (SCAG 2016). However, these areas are planned and projected to accommodate 46 percent of the region’s future household growth and 55 percent of the future employment growth (SCAG 2016).

Development of residential projects, employment centers, or mixed-use projects in TPAs in the region, that are consistent with a specific plan for which an Environmental Impact Report has been certified, can proceed without further CEQA review assuming that they are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCS (Section 21155.4 of CEQA).

### **3.4 EXISTING GENERAL PLAN AND ZONING DESIGNATIONS**

The Project area has a General Plan land use designation of Manufacturing and a zone classification of Manufacturing (City of Monrovia 2019). Figure 3-3 shows the existing zoning for the Project area and surrounding areas (City of Monrovia 2019).

### **3.5 PROJECT COMPONENTS**

The Project includes the following components: GPA, ZCA, and the Alexan Foothills Specific Plan. Each component is described separately in more detail in Sections 3.6, 3.7, and 3.8, respectively. The Project also includes approval of a Vesting Parcel Map to consolidate eight lots into one lot for the Alexan Foothills Specific Plan area.





Source: ©2019 Google

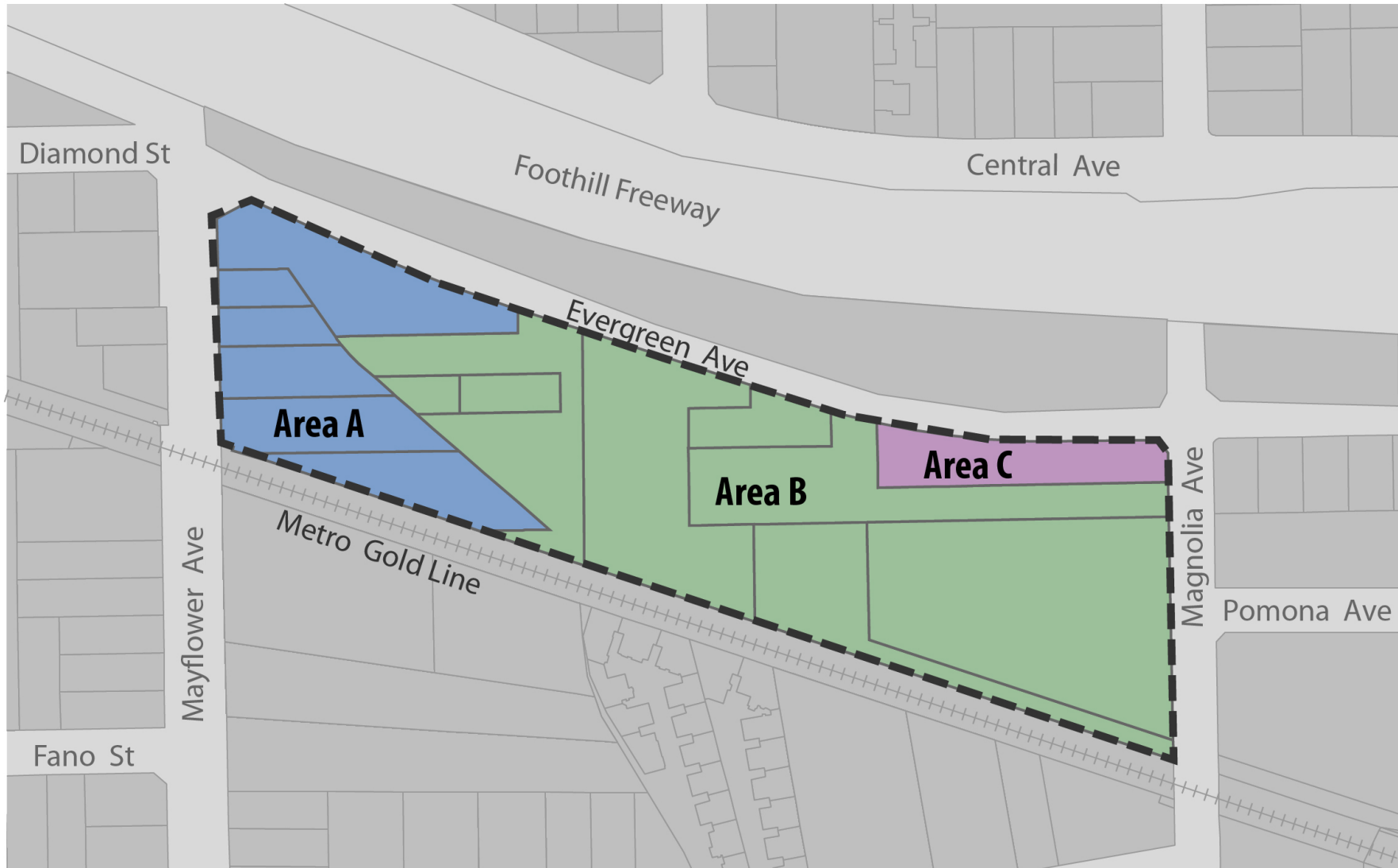
 Project Area

**Figure 3-1 Project Area**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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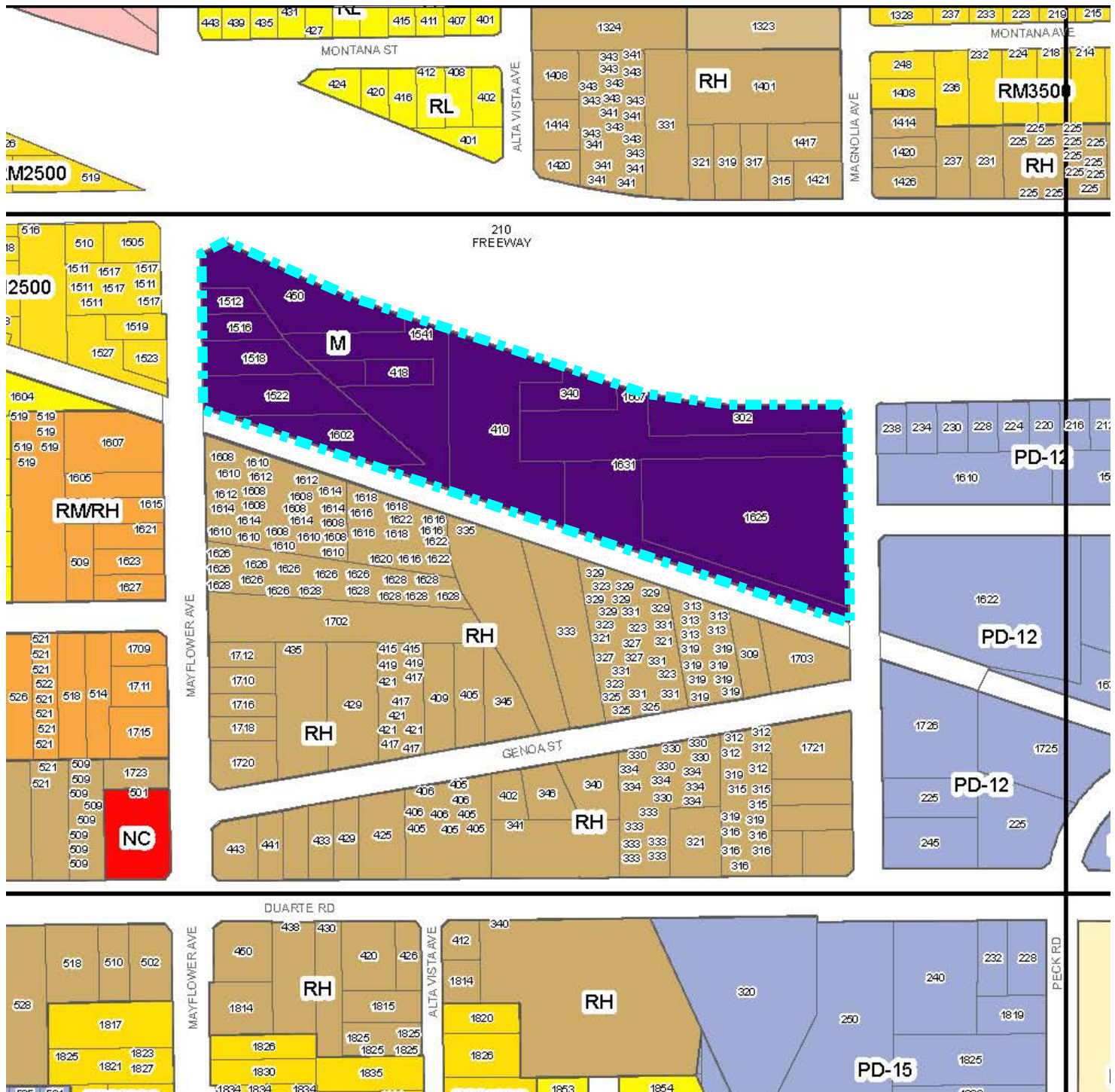
----- Area PD-27: Station Square West



**Figure 3-2** Planned Development Area PD-27: Station Area West

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: City of Monrovia, 2014

**Legend**

- |                           |   |                         |  |
|---------------------------|---|-------------------------|--|
| City Boundary             | Hillside Reserve                                  | Specific Plan           | PD-12 - Planned Development – 12 (Station Square Transit Village)                    |
| ParcelChanges             | Hillside Wilderness Preserve                      | Planned Development     |  |
| Specific Plan             | Business Enterprise                               | Public/Quasi Public     | PD-15 - Planned Development 15 (Area southwest of Peck Rd./ Duarte Rd. Intersection) |
| RecParkPolygon            | Office/Research & Development/Light Manufacturing | Residential Foothill    |  |
| 1 Dwelling Unit/10 Acres  | Manufacturing                                     | Residential Estate      | - Project Area   |
| 1 Dwelling Unit/2.5 Acres | Regional/Subregional Commercial                   | Residential Low         |  |
| 1 Dwelling Unit/20 Acres  | Historic Downtown Commercial                      | Residential Medium      |  |
| 1 Dwelling Unit/3 Acres   | Neighborhood Commercial                           | Residential High        |  |
| 1 Dwelling Unit/5 Acres   | Retail Corridor Commercial                        | Residential Medium-High |  |
| Angeles National Forest   | Retail Corridor Mixed                             |                         |  |

**Figure 3-3 Zoning: Project Area and Surrounding Areas**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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## 3.6 GENERAL PLAN AMENDMENT

The entire 9.63-acre Project area is proposed for a General Plan Amendment from Manufacturing to Planned Development Area (PD-27: Station Square West) at 54 dwelling units/acre (du/ac) (Figure 3-2). The Draft Guidelines for Area PD-27 are provided below.

**Area PD-27: Station Square West:** This is a 9.63 acre city block directly to the west of Station Square Transit Village (PD-12), bounded by Evergreen Avenue to the north, the Metro Gold Line train tracks to the south, South Magnolia Avenue to the east and South Mayflower Avenue to the west. This area has historically been zoned and developed for light- and heavy-manufacturing. The site is currently improved with a mixture of uses, including commercial/industrial businesses and legal nonconforming single family homes. Due to its proximity to the Monrovia Gold Line Station, this area is well suited to provide additional opportunities for transit oriented development to support Station Square Transit Village (PD-12).

### General Provisions

1. A maximum PD area-wide residential build-out of 518 units shall be permitted. The maximum buildout is based on an overall density of 54 du/ac. The intensity of development shall be higher on the east end, and lower on the west end. Development proposed in excess of 518 units over the entire Planned Development Area shall require amendment of the Land Use Element of the General Plan.
2. New development shall be designed to be compatible with the Urban Design Objectives outlined in the Land Use Element for the Station Square Transit Village (PD-12) area (i.e., architecture, hardscape, landscape). New developments shall be designed to minimize massing and provide for articulation and design variety to enhance the pedestrian realm (i.e., include a pedestrian-scaled façade, provide easily identifiable pedestrian access to building entrances, etc.).
3. Existing legal uses and buildings shall be considered conforming.
4. New development located adjacent to or facing residential neighborhoods south of the Gold Line light rail tracks shall be designed to minimize potential adverse impacts, including light, glare, noise, and building mass.
5. New development with frontage on Magnolia shall incorporate streetscape that compliments Station Square Transit Village (PD-12), including architectural massing, character, and the pedestrian environment.
6. The parking requirements of the Monrovia Municipal Code shall apply. If a specific plan is proposed, a parking demand analysis may be provided.
7. A minimum of two acres is required for a specific plan.

### Specific Provisions by Area

PD-27 is divided into three distinct areas. Specific guidelines have been established for each area within the Planned Development Area that address and respond to the existing conditions and allow for future development. Both the General Provisions and the Specific Provisions by Area apply to development within each area. To the extent there is a conflict between a general and specific provision, the specific provision shall control. Where both the general and specific provisions are silent, the Monrovia Municipal Code shall control.

**Area A:**

This area is approximately 2.3 acres and comprises the western edge of the Planned Development Area. The parcels fronting or adjacent to South Mayflower Avenue are currently developed with a mixture of residential and commercial/industrial buildings. Given the residential character of the surrounding neighborhood, this area is envisioned to be a medium-high to high-density residential neighborhood and shall be subject to the below provisions.

1. New multiple-family residential development on property totaling less than two acres shall be subject to the RH (Residential High Density) development standards and a maximum density of 23 dwelling units per acre.
2. New additions to existing residences or construction of additional units on previously developed parcels shall be subject to the RH development standards.
3. New nonresidential uses in existing nonresidential structures shall be subject to the provisions of the BE (Business Enterprise) zone.
4. The construction of new nonresidential buildings or additions to existing nonresidential buildings shall require the approval of a conditional use permit. However, a conditional use permit is not required if an addition is less than or equal to 25% of the existing building area, and the addition meets the requirements set forth in the Monrovia Municipal Code. New nonresidential buildings or additions to existing nonresidential buildings that are adjacent to residential properties shall meet the side and rear yard setback requirements of the adjacent residential zone.

**Area B:**

Area B is 6.77 acres and the standards include provisions for high density residential development. Given its proximity to the Monrovia METRO Gold Line Station, Area B allows for Transit Oriented Development that provides additional residential opportunities adjacent to and compatible with Station Square Transit Village (PD-12).

1. New multiple-family residential development on property that totals less than two acres shall be subject to the RH (Residential High Density) development standards and a maximum density of 54 dwelling units per acre.
2. As an incentive to provide transit-oriented development adjacent to Station Square Transit Village (PD-12), project sites that total two acres or greater may be developed at a maximum density of 64 dwelling units per acre through adoption of a Specific Plan (for a maximum of 436 units over the 6.77 acre area) and shall include a provision for a nonresidential or flex space such as a live/work component through the approval of a specific plan.
3. New development shall have its primary orientation towards South Magnolia Avenue.
4. All ground level interior spaces that front South Magnolia Avenue shall be directly accessible from the sidewalk.
5. High-quality exterior building design (signature architecture) shall be a primary consideration in the approval of a new development.
  - a. If mixed-use developments are proposed, they shall: incorporate neighborhood-serving ground floor commercial space with frequent sidewalk entrances to promote pedestrian activity along the street; include communal and private open space for residents; make ground floor commercial uses visually distinct from the

residential above; distinguish residential entrances from commercial entrances; and incorporate upper floor balconies, bays, and windows that overlook the street into residential units to enliven the street elevation.

- b. If multi-family developments are proposed, they shall: introduce variation in façade and height to reduce building bulk; articulate building facades to portray a domestic scale and give identity to individual dwelling units; orient building entrances towards the street; and shall include private outdoor space for each dwelling unit.

**Area C:**

The 24,206 square foot parcel located on the southwest corner of West Evergreen Avenue and South Magnolia Avenue is currently developed with three commercial/industrial buildings. Area C permits commercial uses that support the adjacent transit oriented neighborhood and shall be subject to the below provisions.

1. New commercial uses in existing structures and new construction shall be subject to the provisions of the BE (Business Enterprise) zone provided they do not cause a nuisance to adjacent sites; they are carried out entirely within an enclosed building that meets high quality building design, site layout and landscape standards, and they will harmonize with other surrounding land uses, with the following exceptions:
  - a. The construction of new nonresidential buildings or additions to existing nonresidential buildings shall require the approval of a conditional use permit. However, a conditional use permit is not required if an addition is less than or equal to 25% of the existing building area, and the addition meets the requirements set forth in the Business Enterprise Zone of the Monrovia Municipal Code.
  - b. As an incentive to provide transit related or smaller-scale neighborhood serving commercial uses providing a retailing or service-oriented function, incidental retail sales of products manufactured on site may be permitted within existing commercial/industrial buildings without the provision of additional parking, subject to the review and approval of a minor conditional use permit.
  - c. An up to 10% reduction in required parking for new uses in existing structures may be permitted subject to a minor exception, provided that no existing parking spaces are eliminated. The removal of all parking spaces shall require approval of a Variance from the Planning Commission.
2. New light manufacturing uses shall conform to the performance standards set forth in Chapter 17.32 of the Monrovia Municipal Code pertaining to fire and explosion hazards, electrical disturbances, noises, vibration, smoke, odors, air pollution, light, and glare to minimize adverse impacts to adjacent residential development.
3. All supplies, products, materials, and equipment shall be stored within the building. Outdoor storage of supplies, products, materials, and equipment is prohibited.
4. To improve pedestrian traffic and connection to Station Square Transit Village (PD-12), the addition of well-designed storefronts to the existing commercial/industrial complex is encouraged and shall be permitted to create openings on the north and east building elevations subject to review and approval by the Development Review Committee. If storefronts are proposed, a strong relationship between buildings and the street shall be established through minimal setbacks at storefronts, matching window and door patterns, and frequent location of store entrances along the street.

5. The existing commercial/industrial complex may be permitted to be incorporated into an adjacent Specific Plan Area as a mixed-use component, through an amendment to the Specific Plan, subject to the following:
  - a. Adaptive reuse of the existing buildings is encouraged. Possible uses include shared creative co-working office spaces, artist studios, and micro-breweries.
  - b. New store fronts and pedestrian paths of travel shall be oriented toward the Specific Plan Area to create pedestrian linkages.
  - c. Future redevelopment of the site could include, but not be limited to, pedestrian oriented commercial uses and activities that support the transit oriented neighborhood.

### **3.7 ZONING CODE AMENDMENT**

The Zoning Code Amendment will establish a Planned Development Area (PD-27: Station Square West [PD-27]) for the entire 9.63-acre Project area in order to be consistent with the General Plan Amendment.

A zone change for 2.86 acres is proposed from Manufacturing to a Planned Development Area to include high density residential development as well as other uses identified in PD-27 for Areas A and C (ZCA Areas A and C). For ZCA Area B, refer to Section 3.8, Alexan Foothills Specific Plan below.

While a new zoning designation is proposed for ZCA Areas A and C, the existing uses and structures, would be allowed to remain as legal conforming uses. Although a specific development plan is neither being proposed nor considered at this time for these two areas, the redesignation of PD-27 ZCA Areas A and C could eventually result in development of an additional 82 dwelling units in Area A (based on the 54 dwelling units/acre permitted land use density within the overall 9.63-acre GPA area).

#### **Demolition and Construction**

For the purposes of evaluating air quality, traffic, and noise impacts associated with buildout of ZCA Areas A and C, it was assumed that construction would start in 2021, last approximately 12 months, and involve the demolition of approximately 28,400 square feet of existing building space and associated debris hauling activities.

### **3.8 ALEXAN FOOTHILLS SPECIFIC PLAN**

Trammell Crow Residential proposes to implement the Alexan Foothills Specific Plan, which would establish the zoning for the 6.77-acre site located at 1625 South Magnolia Avenue, Monrovia, California. The Specific Plan area will be located within ZCA Area B.

The Specific Plan includes the following chapters: Introduction, Development Plan, Use Regulations & Development Standards, Implementation Plan, and General Plan Consistency. The Development Plan chapter defines the Land Use Plan, Open Space and Landscape Plan, Urban Design Objectives, Visual Identity, Sustainable Development, Mobility Plan, Gates and Fencing, and Infrastructure Plan. The Use Regulations & Development Standards chapter sets forth the permitted uses within the Specific Plan area and establishes development standards for buildings, site improvements, parking, landscaping, and signs.

The Specific Plan would allow a 436-unit, five-story apartment complex and an eight-level (seven stories) parking structure, containing 798 stalls. The apartment complex would include two pools



and several tenant amenity courtyards. The Magnolia Avenue street frontage proposes a two-story lobby, fitness room, and four live-work units, all with apartments above. Three outdoor/rooftop amenity decks are planned on top of the apartment complex's fourth level; two rooftop decks face the San Gabriel Mountains to the north, and the other faces west. Other tenant amenities include a pet spa, bike "kitchen" (i.e., bicycle repair area), tenant lounge, centralized mail/package delivery room, and a golf simulation room. No offsite improvements to utilities are proposed under the Specific Plan.

The proposed Specific Plan site plan and elevations are shown in Figures 3-4 through 3-8. The proposed Specific Plan open space plan, landscape plan, and fencing plan are shown in Figures 3-9 through 3-11. A mobility plan is shown in Figure 3-12. Site photos are shown in Figure 3-13, and a 3D rendering and view simulations of the Specific Plan are shown in Figures 3-14 through 3-23. Figures 3-4 through 3-23 are provided at the end of this Chapter.

### Residential Units

A residential building summary showing the proposed number and size of residential units is provided in Table 3-1. The full proposed plan set is included in Appendix M.

**Table 3-1 Unit Floor Plans**

	<b>Number of Units</b>	<b>Unit Size</b>
Studio	20	561 sf
One Bedroom	250	686-745 sf
Two Bedroom	147	981-1,246 sf
Live/Work	4	1,561 sf
Three Bedroom	15	1,481 sf
<b>Total</b>	<b>436</b>	<b>375,729 sf</b>
Note: sf square feet		

### Public and Private Open Space

The Specific Plan creates a well-connected assemblage of the proposed private and publicly accessible outdoor urban spaces including plazas, central courtyards, common rooftop decks, pedestrian pathways, and private balconies/patios. The development plan proposes approximately 1,565 square feet (sf) of publicly accessible open space, 67,835 sf of residents' common open space/recreation, 28,265 sf of residents' private open space, and 21,428 sf of landscaped areas as shown in Table 3-2.

**Table 3-2 Open Space and Recreational Space**

<b>Open Space Type</b>	<b>Size</b>
<b>Public</b>	
Public Plaza in Public Courtyard on South Magnolia Avenue (The Terminal)	1,565 sf
<b>Subtotal</b>	<b>1,565 sf</b>
<b>Private</b>	
Studios	0
1 Bedroom (range 62 sf – 72 sf)	16,672 sf
2 Bedrooms (range 65 sf – 72 sf)	10,453 sf
3 Bedrooms (76 sf)	1,140 sf
<b>Subtotal</b>	<b>28,265 sf</b>
<b>Resident's Common Outdoor Areas</b>	
Public Courtyard on South Magnolia Avenue (The Terminal)	866 sf
Pool Court #1 (The Yard)	19,139 sf
Pool Court #2 (The Trestle)	8,967 sf
Courtyard #1 (Monrovia Canyon Court)	4,680 sf
Courtyard #2 - Resident Move-in (Azusa Canyon Court)	2,452 sf
Main Project Entrance and Private Dog Park (The Junction)	8,081 sf
Courtyard #3 (Santa Anita Canyon Court)	4,225 sf
Roof Deck #1	1,625 sf
Roof Deck #2	2,388 sf
Roof Deck #3	1,429 sf
Urban Edge	4,821 sf
<b>Subtotal</b>	<b>58,673 sf</b>
<b>Interior Recreational Amenities</b>	
Fitness Center	2,483 sf
Club House at Main Recreation Area	2,720 sf
Club House at Second Recreation Area	1,605 sf
Golf Simulator	820 sf
Resident Lounge	775 sf
Pet Spa	759 sf
<b>Subtotal</b>	<b>97,665</b>
<b>Landscaped Areas</b>	
Along West Evergreen Avenue	9,136 sf
West Area	11,156 sf
Zoetrope Area	1,136 sf
<b>Subtotal</b>	<b>21,428 sf</b>
<b>Total</b>	<b>207,596 sf</b>
Note: sf square feet	

## Pedestrian, Bicycle, Transit, and Vehicular Mobility

South Magnolia Avenue provides the principle access to the apartment complex, while West Evergreen Avenue provides secondary access. The Alexan Foothills Specific Plan is open to public pedestrian and bicycle access along the entire South Magnolia Avenue frontage. The Specific Plan facilitates the use of bicycle sharing and ride sharing programs by providing bike parking for METRO users and guests, and resident bicycle parking and storage. The mobility plan focuses on integrating and improving the site's access to METRO's Monrovia Gold Line Station, as well as to the surrounding neighborhood. The Monrovia Gold Line Station is located approximately 0.2 mile to the east of the Specific Plan area; it is accessed via West Pomona Avenue. The METRO Gold Line provides service to Azusa and to Downtown Los Angeles, where passengers may connect to many other METRO lines. The Monrovia Gold Line Station also provides the closest bus stop to the Project area, which is serviced both by Foothill Transit and METRO. Another bus stop is located at the intersection of West Duarte Road and South Magnolia Avenue. The proposed parking structure for the Alexan Foothills Specific Plan not only would provide parking for the residents and guests, but also paid parking spaces for the public to facilitate access to the METRO Gold Line Station.

## Cell Towers

Two existing cell towers will be maintained in place at the northwest corner of the Alexan Foothills Specific Plan area in ZCA Area B; however, they may be moved to another location within the Specific Plan area at a future time. In the event that the cell towers are moved, that action would be subject to separate environmental review and approval by the City.

## Development and Operational Standards

The Development Standards of the Alexan Foothills Specific Plan are summarized in Table 3-3.

**Table 3-3 Development Standards**

<b>Development Features</b>	<b>Standard</b>
Density	64 units/acre
Height – Residential Structure	Five stories, 65 feet maximum subject to additional height standards for architectural projections (see below)
Height – Parking Garage Structure	Seven stories, eight levels; 72 feet from structure roofline
Architectural Features projecting above the roofline	10 feet as measured from structure roofline
<b>Minimum Building Setbacks from Rights-of-Way</b>	
West Evergreen Avenue	8 feet
South Magnolia Avenue	8 feet
East property line	8 feet
METRO Gold Line property line	8 feet
Design elements inclusive of exterior building elements, various site design and elements, gates and fencing, landscape, public and private open spaces, pedestrian/ADA pathways, parking structure and parking areas, signs, and any others as determined by the Development Review Committee.	Per approved plans. Modifications subject to Minor Exceptions (Section 17.52.110 of the Municipal Code) or Major Variance (Section 17.52.100) as determined by the Community Development Director, the Development Review Committee, and/or the Planning Commission.
Note: Balconies, stairs, awnings, cornices, eaves, roof overhangs, towers, and stoops may encroach up to 60 percent of the setback to the street.	

In addition, the Specific Plan requires the following standards for lighting, signs, walls and fences, landscaping, mechanical equipment, trash enclosures, and utilities:

- A lighting plan shall be submitted for the Planning Division's review and approval, and shall demonstrate that:
  - Lighting levels are sufficient to provide for pedestrian safety and security, and the security of parked vehicles, but not in any manner that adversely impacts adjacent properties and roadways.
  - Lighting is located to assure adequate light levels and create an even level of illumination.
  - Exterior lighting is architecturally integrated with the building style, materials, finishes, and colors.
  - **Residential Areas.** All exterior residential lighting shall be designed to be decorative and unobtrusive. Lighting shall be designed to avoid glare into neighboring homes, public spaces, or into the night sky. Illumination of common open spaces shall be low profile.
  - **Area Lighting for Pedestrian Walkways and Plazas.** Lighting shall be directed to provide for safety without allowing stray light to intrude into windows of nearby residences or to create glare problems for nearby roadway traffic.
  - **"Hidden Source" Lighting.** For certain prominent architectural features, hidden source lighting can be used to create dramatic effects, illuminating towers or other unique architectural features. Such lighting can be concealed in soffits, behind ledges or parapets, or set into landscape areas with the light directed at the element to be highlighted. Use of low, bollard-type lighting and/or landscape accent lighting is encouraged, especially in pedestrian areas.
- Prior to the installation of any sign or signs, a comprehensive sign program shall be submitted for approval by the Development Review Committee. The sign program may include project identity, wayfinding (for parking, pedestrian, bicycles, residents and guests), and operational notices. The design, location, illumination levels, and size of signs shall consider the residential nature of the development. The sign program and all signs shall be based on the requirements set forth in Chapter 17.28 (Sign) of the Zoning Code.
- Walls and fences inclusive of controlled access barriers, gates, equipment screening, and trash enclosures are allowed up to 6' maximum height. The maximum height for walls and fences facing West Evergreen and South Magnolia Avenue shall be no more than 6' at the setback line. The Development Review Committee shall be the review authority for the walls and fencing plan. Design of walls, and fences shall have the following characteristic:
  - Integrates with the building design using similar, or complementary colors and material suitable for a gateway location;
  - Does not obstruct publicly accessible areas; and
  - Observes relevant Crime Prevention Through Environmental Design (CPTED) principles.

Use of buffers (such as landscaped planters) in lieu of walls and fences is encouraged.

- Landscaping shall be provided in substantial conformance with the landscape plan contained in the project application submittals. The purpose of the landscaping standards and guidelines is to provide landscaping that enhances the quality of the development,

creates shade for pedestrians, uses drought tolerant plant materials that are sustainable and beneficial, and contributes positively to the appearance of the Alexan Foothills development. In addition, a landscape documentation package pursuant to the requirements Section 17.20.030 (Water Efficient Landscape Ordinance) of the Monrovia Municipal Code shall be submitted to the Planning Division for approval prior to landscape construction. All installation and documentation shall be performed as required by the Code. The landscape documentation package will have precedence.

- Landscape maintenance shall be performed as required by applicable Title 8 (Health and Safety) of the Municipal Code.
- Landscape design quality shall be measured for its qualities that communicate an outstanding attention to fine landscape architecture. The master landscape concept for Alexan Foothills Specific Plan shall respond to the following goals and objectives:
  - Create “green areas” and enhance important public spots easily accessible to all in the community;
  - Make sidewalks, walkways, and all pedestrian areas convenient, attractive, comfortable, and safe; and
  - Accommodate multimodal transportation modes throughout the Specific Plan area, including walking.
- To the extent consistent with other design considerations, landscape design shall minimize resource consumption. Materials considered shall protect the natural environment from long-term harm. Hardscape materials shall be used that are long lived and use minimal energy in their manufacture and/or transport to the site, have high recycled content, and have minimal non-renewable material content.
- For reducing the site’s energy requirements by encouraging passive methods of cooling, trees shall be sited to provide shade for the south-facing building elevations.
- Drought-tolerant landscaping is highly encouraged. Plant selection should be based on site characteristics such as exposure, light intensity, soil analysis, site drainage, and irrigation. Proper plant selection based on site characteristics should enhance the plants’ likelihood of becoming established in the site and reduce potential incidences of low vigor, excessive maintenance, disease, or death.
- To ensure water efficiency, appropriate landscaping should be irrigated through a drip, bubbler, or high- efficiency sprinkler system.
- In addition to architectural treatments, landscaping material shall be used to obscure the view of any refuse collection area, equipment, Fire Department connections, and loading areas visible from the public street or pedestrian area.
- Development shall include appropriate landscaping to maximize privacy between residences and shall include appropriate planting to screen or soften any undesirable light pollution or views from off site.
- Design shall take into consideration the future impact the new plantings may have in obscuring views.

- The landscape palette shall allow for a high degree of water conservation. Irrigation practices shall include the use of water-efficient equipment that complies with applicable City codes. The irrigation system shall be designed to meet the following criteria:
  - The system shall conform to the regulations for the construction of irrigation water systems within the City of Monrovia;
  - Within the landscaped areas, an approved weather-based irrigation system is encouraged;
  - Design, installation, and equipment shall conform to the highest industry standards. All constant pressure reclaimed and/or potable water mainline piping installed shall be identified in accordance with the City of Monrovia regulations;
  - All irrigation systems shall be controlled with automatic irrigation controllers and be installed to maximize ease of operation and maintenance;
  - Systems shall be installed in a manner that minimizes opportunities for vandalism. All controllers, pumps and associated equipment must be screened from view with planting and/or landscape walls;
  - All landscape planting areas are to be adequately irrigated;
  - Irrigation systems shall be programmed to operate generally between the hours of 9:00 P.M. and 6:00 A.M., unless otherwise directed by the City Engineer; and
  - Sprinkler heads shall be located to avoid over spray on to sidewalks, roadways, buildings, etc.
- All aboveground mechanical equipment—including but not limited to aboveground utility boxes, telephone boxes, water lines, back-flow preventers, and cable boxes—shall be completely screened behind a permanent structure or appropriate landscape screen.
- Air conditioners, heating, cooling and ventilating equipment, and all other mechanical, lighting, and electrical devices shall be screened from view and noise from adjacent properties.
- Roof-mounted equipment shall not be visible from the adjacent public right-of-way or adjacent properties. As necessary, screening shall be provided by a parapet wall or similar architectural feature.
- Transformers shall be installed underground or in areas where they will be screened from the public right-of-way.
- Enclosures shall be required for refuse and recycling bins. All such enclosures shall be located within the parking structure or otherwise interior to the development. Secured trash and recycling bins may also be located on any publicly accessible areas and shall be integrated into the site's prevailing design elements. Areas for trash enclosures shall be adequate in capacity, number, and distribution to serve the development project.
- All trash enclosures shall be set forth on the site plan and subject to review and approval by the Community Development Director.
- All utility connections for new construction shall be placed underground along the project frontage, but utility connections to structures that lawfully pre-exist the adoption of this Specific Plan may be maintained when it can be demonstrated that the undergrounding of

such utilities is not reasonably feasible, as determined by the Development Review Committee and/or the utility provider.

Operational Standards for the Alexan Foothills Specific Plan include the following:

- The Specific Plan sets a maximum of four live/work units, all of which shall be placed on the ground floor of the development with entries facing onto the Plaza at South Magnolia Avenue. Internal access between residential and nonresidential portions of these units shall be required. No nonresidential use, either for commercial or nonprofit purpose, is permitted to operate outside a live/work unit or outside a live/work unit's front patio area (facing Magnolia Avenue).
- Work areas may only be open for business between the hours of 6:00 A.M. and 8:00 P.M., unless late night operations have been approved through a Conditional Use Permit.
- Activities that produce any noise or sound that is objectionable due to intermittence, beat, frequency, shrillness, or loudness shall be prohibited.
- All outdoor storage is prohibited, including placement of residential storage in open space areas, except for pool equipment storage room or other enclosed storage area planned for, and articulated, as part of the building's design as set forth on the approved site plan. Storage on residential unit patios and balconies shall be prohibited.
- Uses and activities covered under the City's Special Events Permit, Filming Permit, and Yard Sales Permit are allowed onsite upon the written consent of the site's property owner or designee and the City.

### Demolition and Construction

Approximately 65,190 sf of existing structures would be demolished and construction of the Specific Plan development would involve 7,200 cubic yards (cy) of cut, 10,400 cy of fill, with a net import of 3,200 cy<sup>1</sup>. Construction of the Specific Plan development is planned to begin in 2020 and expected to take 30 months to complete, with a target construction completion date in 2022.

### Project Components Summary

Summary statistics for the GPA, ZCA, and Alexan Foothills Specific Plan are provided in Table 3-4.

**Table 3-4 Summary Statistics of Project Components**

Project Component	Size (Acres)	Existing Uses (Square feet, Dwelling units)	Existing General Plan & Zoning Designations	Proposed Uses (Square feet, Dwelling units)	Proposed General Plan & Zoning Designation
<b>General Plan Amendment (GPA)</b>					
GPA	9.63	Light Industrial (incl warehouse, office, out structures)	General Plan: Manufacturing	Multi-Family Residential 518 DU	General Plan: Planned Development (PD-27: Station Square West)

<sup>1</sup> Under a worst-case scenario; grading volumes may be reduced after final design.

**Table 3-4 Summary Statistics of Project Components**

Project Component	Size (Acres)	Existing Uses (Square feet, Dwelling units)	Existing General Plan & Zoning Designations	Proposed Uses (Square feet, Dwelling units)	Proposed General Plan & Zoning Designation
		(approx. 80,870 sf)			
		Single Family Residential Units (6,088 sf.; 5 DUs)			
		Church & Accessory Structures (approx. 6,630 sf)			
<b>GPA Total</b>	<b>9.63</b>			<b>518 DU</b>	
<b>Zoning Code Amendment (ZCA) and Alexan Foothills Specific Plan</b>					
PD-27 Areas A and C	2.86	Light Industrial (approx. 24,680 sf)	Zoning: Manufacturing	Multi-Family Residential 82 DU	Zoning: Planned Development (PD-27)
		Single-Family Residential Units (3,720 sf; 4 DU)			
PD-27 Area B: Alexan Foothills Specific Plan	6.77	Light Industrial (incl warehouse, office) & Accessory Structures (approx. 56,190 sf)	Zoning: Manufacturing	Multi-Family Residential 436 DU	Zoning: Specific Plan
		Single Family Residential Units (2,368 sf.; 1 DU)			
		Church & Accessory Structures (approx. 6,630 sf)			
<b>ZCA &amp; Specific Plan Total</b>	<b>9.63</b>			<b>518 DU</b>	
Notes: DU dwelling units SF square feet					



## 3.9 PROJECT OBJECTIVES

### General Plan Amendment

The objectives for the Planned Development General Plan Amendment are as follows:

- Objective GPA-1. Create a cohesive and complementary land use plan that provides additional housing capacity and transit oriented development opportunities to support Station Square Transit Village (PD-12).

### Zoning Code Amendment

The objectives for the Planned Development Zoning Code Amendment are as follows:

- Objective ZCA-1. Provide flexibility in land use types and intensities that will allow future development to respond to changes in the marketplace over time.
- Objective ZCA-2. Provide land use guidance for three distinct areas (Areas A, B, and C) within the Planned Development Area PD-27: Station Square West area.

### Alexan Foothills Specific Plan

The objectives for the Alexan Foothills Specific Plan are as follows:

- Objective SP-1. Provide more opportunities for high-density housing near transit within Area B and the City by increasing density to 54 units per acre to meet the goals of the City's Housing Element.
- Objective SP-2. Broaden the type of housing options in the City by creating opportunities for modern, attractive, multi-family residential development.
- Objective SP-3. Accommodate a walkable urban form in the City by improving the pedestrian environment with active, small-format ground-floor public spaces, accessible sidewalks and pathways, and pedestrian amenities.
- Objective SP-4. Improve multi-modal accessibility, connectivity, and safety by providing public parking for METRO's Monrovia Gold Line Station, providing accessible pathways to enable safe access to the METRO station, and by promoting bicycle use by providing convenient bicycle amenities and storage options.
- Objective SP-5. Improve the physical character and aesthetic appeal of the area with the gradual introduction of new developments that include attractive architectural styles, landscaping, connectivity and walkability, public art, and welcoming and unified gateway elements.
- Objective SP-6. Integrate open space and resident amenities by integrating plazas and small gathering spaces, such as rooftop decks.

### 3.10 INTENDED USE OF THIS EIR

This EIR can be used to support the following discretionary approval processes by the City:

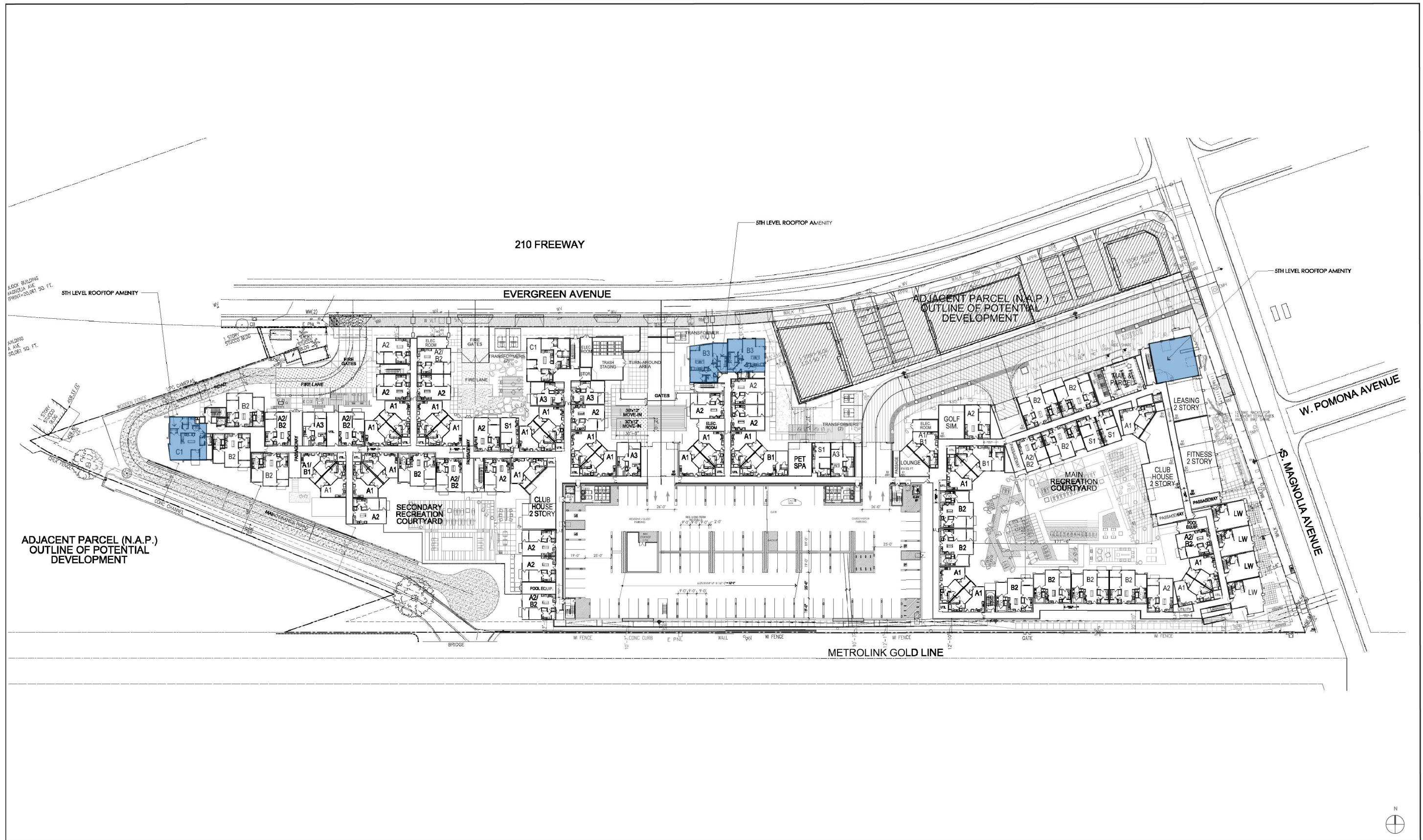
- Approval of a GPA from Manufacturing to Planned Development Area PD-27: Station Square Area West for the 9.63-acre Project area;
- Approval of a ZCA from Manufacturing to Planned Development Area (PD) for 2.86 acres (Areas A and C) within PD-27: Station Square Area West;
- Adoption of the Alexan Foothills Specific Plan for 6.77 acres (Area B) within Planned Development Area PD-27: Station Square Area West;
- Approval of a Conditional Use Permit (CUP) to authorize the construction of a 436-unit apartment complex within the Alexan Foothills Specific Plan area; and
- Approval of a Vesting Parcel Map to consolidate eight lots into one lot for the Alexan Foothills Specific Plan area.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
APN	Assessor Parcel Number
CUP	Conditional Use Permit
cy	cubic yards
DU	dwelling units
du/ac	dwelling units per acre
EIR	Environmental Impact Report
GPA	General Plan Amendment
HQTA	High Quality Transit Area
METRO	Los Angeles County Metropolitan Transportation Authority
PD	Planned Development Area
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
sf	square feet
TPA	Transit Priority Area
ZCA	Zoning Code Amendment

### References Cited

City of Monrovia  
 2019 General Plan Land Use Map and Zoning Map. July.

Southern California Association of Governments (SCAG)  
 2016 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).  
 Adopted April.



Source: TCR, 2019

**Figure 3-4** Specific Plan Site Plan

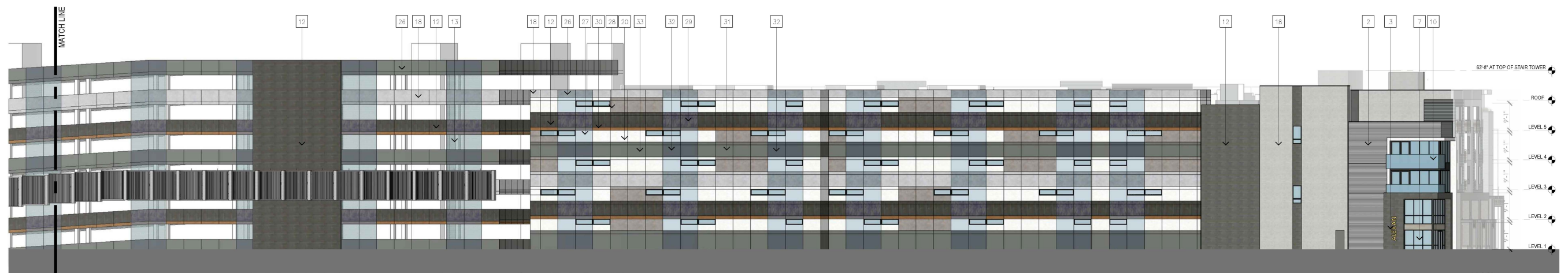
PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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2. SOUTH ELEVATION

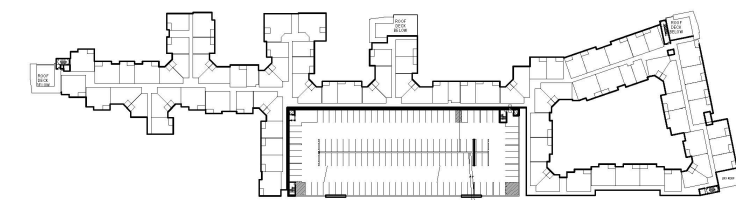


SOUTH ELEVATION (CONT'D.)

Source: TCR, 2019

MATERIALS LEGEND	
1a	LA HABRA EXTERIOR PLASTER 20/30 FLOAT FINISH - PAINT GRADE
1b	LA HABRA EXTERIOR PLASTER 16/20 FLOAT FINISH - PAINT GRADE
2	HARDIE PLANK SIDING
3	APAVISA PORCELAIN TILE 'JUNOON' BEIGE NATURAL
4	DECORATIVE WIDE FLANGE TRIM
5	WIDE FLANGE TRELLIS W/ WOOD SLATS
6	MILGARD VINYL WINDOWS 'CLAY'
7	KAWNEER OR EQUAL ALUMINUM STOREFRONT 'MED. DARK BRONZE'
8	METAL MESH RAILING
9	METAL RAILING WITH COMPOSITE SLATS
10	GLASS RAILING
11	METAL RAILING
12	FLOOR GRES PORCELAIN TILE 'FLOWTECH' AGED BRONZE
13	EXPOSED FASTNER SHORT RIB PERFORATED PANELS
14	ORCO BLOCK SPLIT FACE PLANTERS 'BLACK 250'
15	ORCO BLOCK C.M.U. PLANTERS W/COMPOSITE WOOD SLATS
17	GABION WALL
18	MATCH SW 9161 'DUSTBLU' IN 20/30 FLOAT FINISH
19	MATCH SW 9161 'DUSTBLU' IN 16/20 FLOAT FINISH
20	LA HABRA STUCCO X50 'CRYSTAL WHITE' IN 20/30 FLOAT FINISH
21	A HABRA STUCCO X50 'CRYSTAL WHITE' IN 16/20 FLOAT FINISH
22	MATCH SW 7075 'WEB GRAY' IN 20/30 FLOAT FINISH
23	MATCH SW 7075 'WEB GRAY' IN 16/20 FLOAT FINISH
24	AESPAN 'PERCEPTION COLLECTION' CONCEALED FASTENED PANELS IN 'METALLIC SILVER' OR 'TOWN GRAY'
26	MATCH SW 6515 'LEISURE BLUE' IN 16/20 FINISH
27	MATCH SW 6514 'RESPITE' IN 20/30 FLOAT FINISH
28	MATCH SW 6004 'MINK' IN 20/30 FLOAT FINISH
29	MATCH SW7505 'MANOR HOUSE' IN 16/20 FLOAT FINISH
30	MATCH SW 7703 'EARTHEN JUG' IN 20/30 FLOAT FINISH
31	MATCH SW 6005 'FOLKSTONE' IN 2030 FLOAT FINISH
32	MATCH SW 7603 'POOLHOUSE' IN 16/20 FLOAT FINISH
33	MATCH SW 9167 'POLISHED CONCRETE' IN 20/30 FLOAT FINISH

THIS MATERIALS LEGEND IS A COMPLETE MATERIAL AND COLOR LIST FOR THE PROJECT. SOME IDENTIFIED NUMBERS DO NOT OCCUR ON THESE ELEVATIONS AND RELATE TO THE MATERIAL SAMPLE ON THE MATERIAL BOARD.



KEY MAP



N.T.S.

\*SEE CIVIL PLANS FOR ADDITIONAL GRADING INFO.

ELEVATIONS



SCALE: 1/16" = 1'

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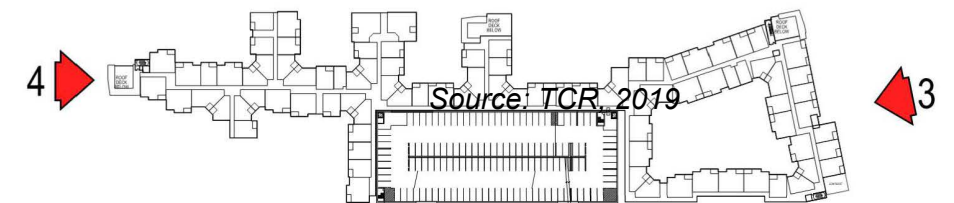


4. WEST ELEVATION

Source: TCR, 2019

MATERIALS LEGEND	
1a	LA HABRA EXTERIOR PLASTER 20/30 FLOAT FINISH - PAINT GRADE
1b	LA HABRA EXTERIOR PLASTER 16/20 FLOAT FINISH - PAINT GRADE
2	HARDIE PLANK SIDING
3	APAVISA PORCELAIN TILE 'JUNOON' BEIGE NATURAL
4	DECORATIVE WIDE FLANGE TRIM
5	WIDE FLANGE TRELLIS W/ WOOD SLATS
6	MILGARD VINYL WINDOWS 'CLAY'
7	KAWNEER OR EQUAL ALUMINUM STOREFRONT 'MED. DARK BRONZE'
8	METAL MESH RAILING
9	METAL RAILING WITH COMPOSITE SLATS
10	GLASS RAILING
11	METAL RAILING
12	FLOOR GRES PORCELAIN TILE 'FLOWTECH' AGED BRONZE
13	EXPOSED FASTNER SHORT RIB PERFORATED PANELS
14	ORCO BLOCK SPLIT FACE PLANTERS 'BLACK 250'
15	ORCO BLOCK C.M.U. PLANTERS W/COMPOSITE WOOD SLATS
17	GABION WALL
18	MATCH SW 9161 'DUSTBLU' IN 20/30 FLOAT FINISH
19	MATCH SW 9161 'DUSTBLU' IN 16/20 FLOAT FINISH
20	LA HABRA STUCCO X50 'CRYSTAL WHITE' IN 20/30 FLOAT FINISH
21	A HABRA STUCCO X50 'CRYSTAL WHITE' IN 16/20 FLOAT FINISH
22	MATCH SW 7075 'WEB GRAY' IN 20/30 FLOAT FINISH
23	MATCH SW 7075 'WEB GRAY' IN 16/20 FLOAT FINISH
24	AESPAN 'PERCEPTION COLLECTION' CONCEALED FASTENED PANELS IN 'METALLIC SILVER' OR 'TOWN GRAY'
26	MATCH SW 6515 'LEISURE BLUE' IN 16/20 FINISH
27	MATCH SW 6514 'RESPITE' IN 20/30 FLOAT FINISH
28	MATCH SW 6004 'MINK' IN 20/30 FLOAT FINISH
29	MATCH SW7505 'MANOR HOUSE' IN 16/20 FLOAT FINISH
30	MATCH SW 7703 'EARTHEN JUG' IN 20/30 FLOAT FINISH
31	MATCH SW 6005 'FOLKSTONE' IN 2030 FLOAT FINISH
32	MATCH SW 7603 'POOL HOUSE' IN 16/20 FLOAT FINISH
33	MATCH SW 9167 'POLISHED CONCRETE' IN 20/30 FLOAT FINISH

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KEY MAP

N.T.S.

\*SEE CIVIL PLANS FOR ADDITIONAL GRADING INFO.

ELEVATIONS



SCALE: 1/16" = 1'

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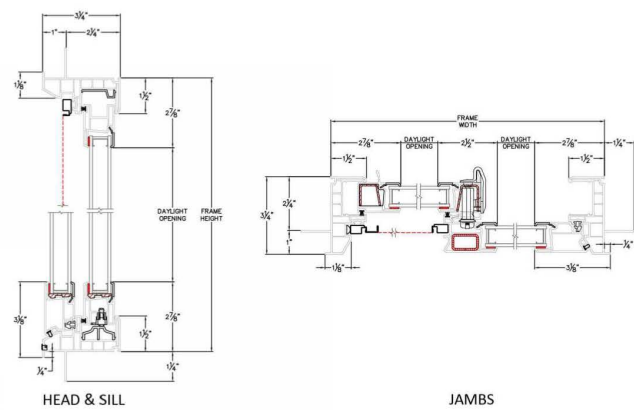


1. NORTH ELEVATION



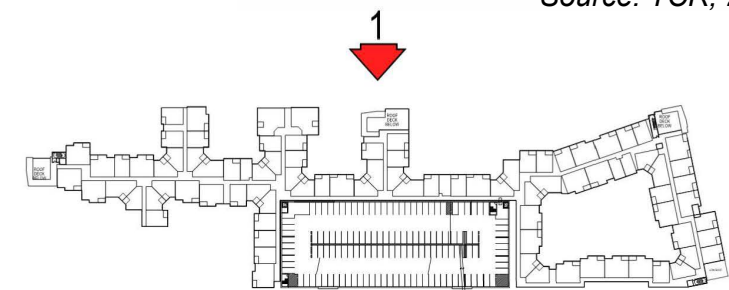
NORTH ELEVATION (CONT'D.)

Source: TCR, 2019



MATERIALS LEGEND			
1a	LA HABRA EXTERIOR PLASTER 20/30 FLOAT FINISH - PAINT GRADE	18	MATCH SW 9161 'DUSTBLU' IN 20/30 FLOAT FINISH
1b	LA HABRA EXTERIOR PLASTER 1 1/20 FLOAT FINISH - PAINT GRADE	19	MATCH SW 9161 'DUSTBLU' IN 1 1/20 FLOAT FINISH
2	HARDIE PLANK SIDING	20	LA HABRA STUCCO X50 'CRYSTAL WHITE' IN 20/30 FLOAT FINISH
3	APAVISA PORCELAIN TILE 'JUNOON' BEIGE NATURAL	21	A HABRA STUCCO X50 'CRYSTAL WHITE' IN 1 1/20 FLOAT FINISH
4	DECORATIVE WIDE FLANGE TRIM	22	MATCH SW 7075 'WEB GRAY' IN 20/30 FLOAT FINISH
5	WIDE FLANGE TRELLIS W/ WOOD SLATS	23	MATCH SW 7075 'WEB GRAY' IN 1 1/20 FLOAT FINISH
6	MILGARD VINYL WINDOWS 'CLAY'	24	AESPAN 'PERCEPTION COLLECTION' CONCEALED FASTENED PANELS IN 'METALLIC SILVER' OR 'TOWN GRAY'
7	KAWNEER OR EQUAL ALUMINUM STOREFRONT 'MED. DARK BRONZE'	26	MATCH SW 6515 'LEISURE BLUE' IN 1 1/20 FINISH
8	METAL MESH RAILING	27	MATCH SW 6514 'RESPIRE' IN 20/30 FLOAT FINISH
9	METAL RAILING WITH COMPOSITE SLATS	28	MATCH SW 6004 'MINK' IN 20/30 FLOAT FINISH
10	GLASS RAILING	29	MATCH SW 7505 'MANOR HOUSE' IN 1 1/20 FLOAT FINISH
11	METAL RAILING	30	MATCH SW 7703 'EARTHEN JUG' IN 20/30 FLOAT FINISH
12	FLOOR GRES PORCELAIN TILE 'FLOWTECH' AGED BRONZE	31	MATCH SW 6005 'FOLKSTONE' IN 2030 FLOAT FINISH
13	EXPOSED FASTNER SHORT RIB PERFORATED PANELS	32	MATCH SW 7603 'POOL HOUSE' IN 1 1/20 FLOAT FINISH
14	ORCO BLOCK SPLIT FACE PLANTERS 'BLACK 250'	33	MATCH SW 9167 'POLISHED CONCRETE' IN 20/30 FLOAT FINISH
15	ORCO BLOCK C.M.U. PLANTERS W/COMPOSITE WOOD SLATS		
17	GABION WALL		

THIS MATERIALS LEGEND IS A COMPLETE MATERIAL AND COLOR LIST FOR THE PROJECT. SOME IDENTIFIED NUMBERS DO NOT OCCUR ON THESE ELEVATIONS AND RELATE TO THE MATERIAL SAMPLE ON THE MATERIAL BOARD.



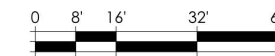
KEY MAP



N.T.S.

\*SEE CIVIL PLANS FOR ADDITIONAL GRADING INFO.

ELEVATIONS



SCALE: 1/16" = 1'

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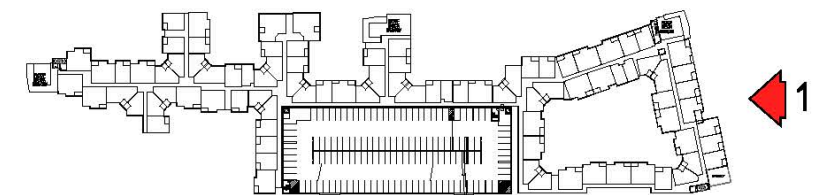
1. EAST ELEVATION (MAGNOLIA)

Source: TCR, 2019

**MATERIALS LEGEND**

1a	LA HABRA EXTERIOR PLASTER 20/30 FLOAT FINISH - PAINT GRADE	18	MATCH SW 9161 'DUSTBLU' IN 20/30 FLOAT FINISH
1b	LA HABRA EXTERIOR PLASTER 16/20 FLOAT FINISH - PAINT GRADE	19	MATCH SW 9161 'DUSTBLU' IN 16/20 FLOAT FINISH
2	HARDE PLANK SIDING	20	LA HABRA STUCCO X50 'CRYSTAL WHITE' IN 20/30 FLOAT FINISH
3	APAVISA PORCELAIN TILE 'JUNCTION' BEIGE NATURAL	21	LA HABRA STUCCO X50 'CRYSTAL WHITE' IN 16/20 FLOAT FINISH
4	DECORATIVE WIDE FLANGE FBM	22	MATCH SW 7075 'WEB GRAY' IN 20/30 FLOAT FINISH
5	WIDE FLANGE TRILLS W/ WOOD SLATS	23	MATCH SW 7075 'WEB GRAY' IN 16/20 FLOAT FINISH
6	MILGARD VINYL WINDOWS 'CLAY'	24	ASPAN 'PERCEPTION COLLECTION' CONCEALED FASTENED PANELS IN 'METALLIC SILVER' OR 'TOWN GRAY'
7	KAWNEER OR EQUAL ALUMINUM STOREFRONT 'MB2, DARK BRONZE'	26	MATCH SW 6515 'LEISURE BLUE' IN 16/20 FINISH
8	METAL MESH RAILING	27	MATCH SW 6514 'RESPIRE' IN 20/30 FLOAT FINISH
9	METAL RAILING WITH COMPOSITE SLATS	28	MATCH SW 6004 'MINI' IN 20/30 FLOAT FINISH
10	GLASS RAILING	29	MATCH SW7505 'MANOR HOUSE' IN 16/20 FLOAT FINISH
11	METAL RAILING	30	MATCH SW 7703 'EARTHEN JUG' IN 20/30 FLOAT FINISH
12	FLOOR GRES PORCELAIN TILE FLOWTECH 'AGED BRONZE'	31	MATCH SW 4005 'FOLKSTONE' IN 20/30 FLOAT FINISH
13	EXPOSED FASTNER SHORT RIB PERFORATED PANELS	32	MATCH SW 7603 'POOL HOUSE' IN 16/20 FLOAT FINISH
14	ORCO BLOCK SPLIT FACE PLANTERS 'BLACK 250'	33	MATCH SW 9167 'POLISHED CONCRETE' IN 20/30 FLOAT FINISH
15	ORCO BLOCK C.M.U. PLANTERS W/COMPOSITE WOOD SLATS		
17	GABION WALL		

THIS MATERIALS LEGEND IS A COMPLETE MATERIAL AND COLOR LIST FOR THE PROJECT. SOME IDENTIFIED NUMBERS DO NOT OCCUR ON THESE ELEVATIONS AND RELATE TO THE MATERIAL SAMPLE ON THE MATERIAL BOARD.



**KEY MAP**

N.T.S.  
\*SEE CIVIL PLANS FOR ADDITIONAL GRADING INFO.

**ENLARGED ELEVATIONS**

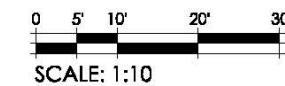
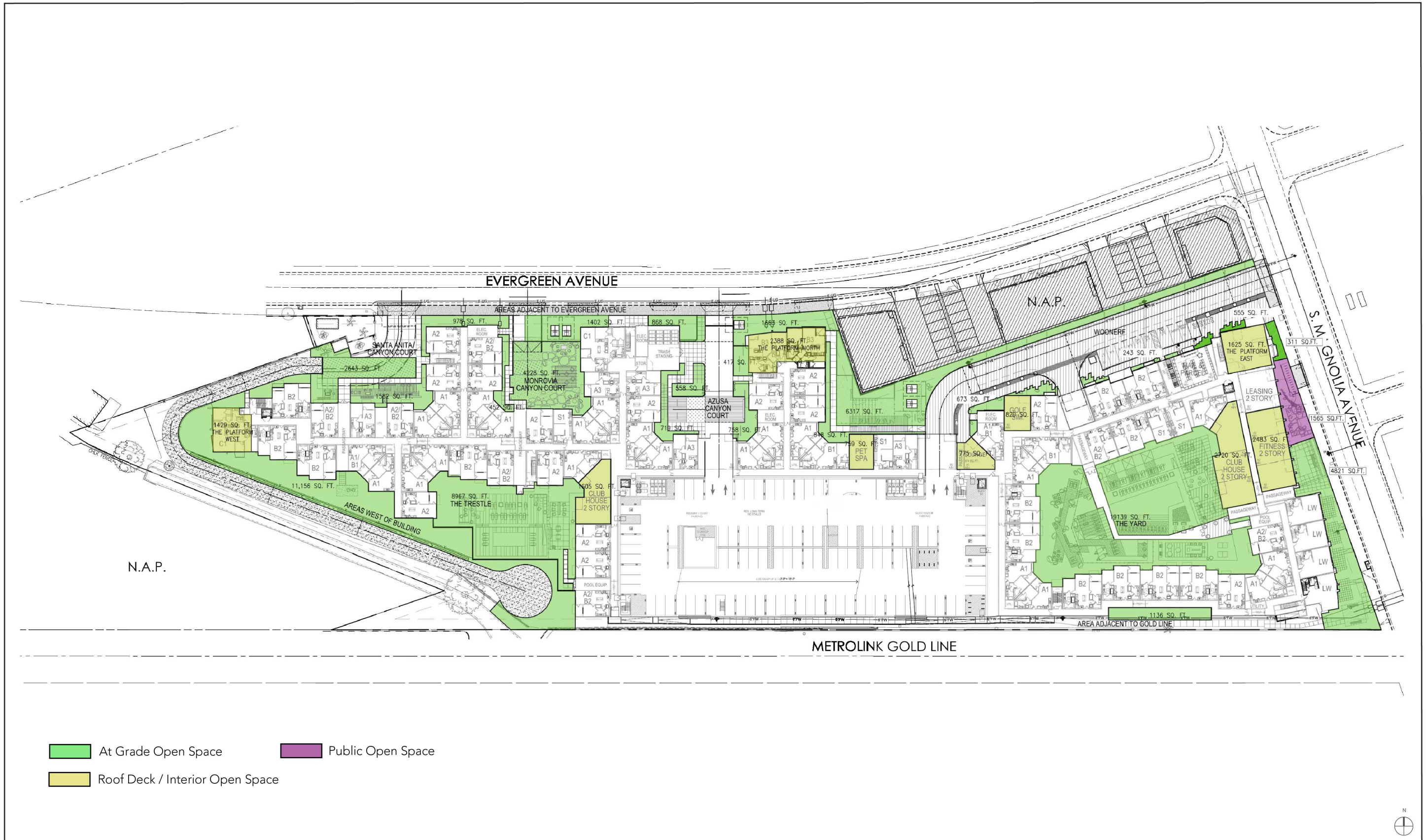


Figure 3-8 Specific Plan East Elevation

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: TCR, 2019

**Figure 3-9 Specific Plan Open Space Plan**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: TCR, 2019

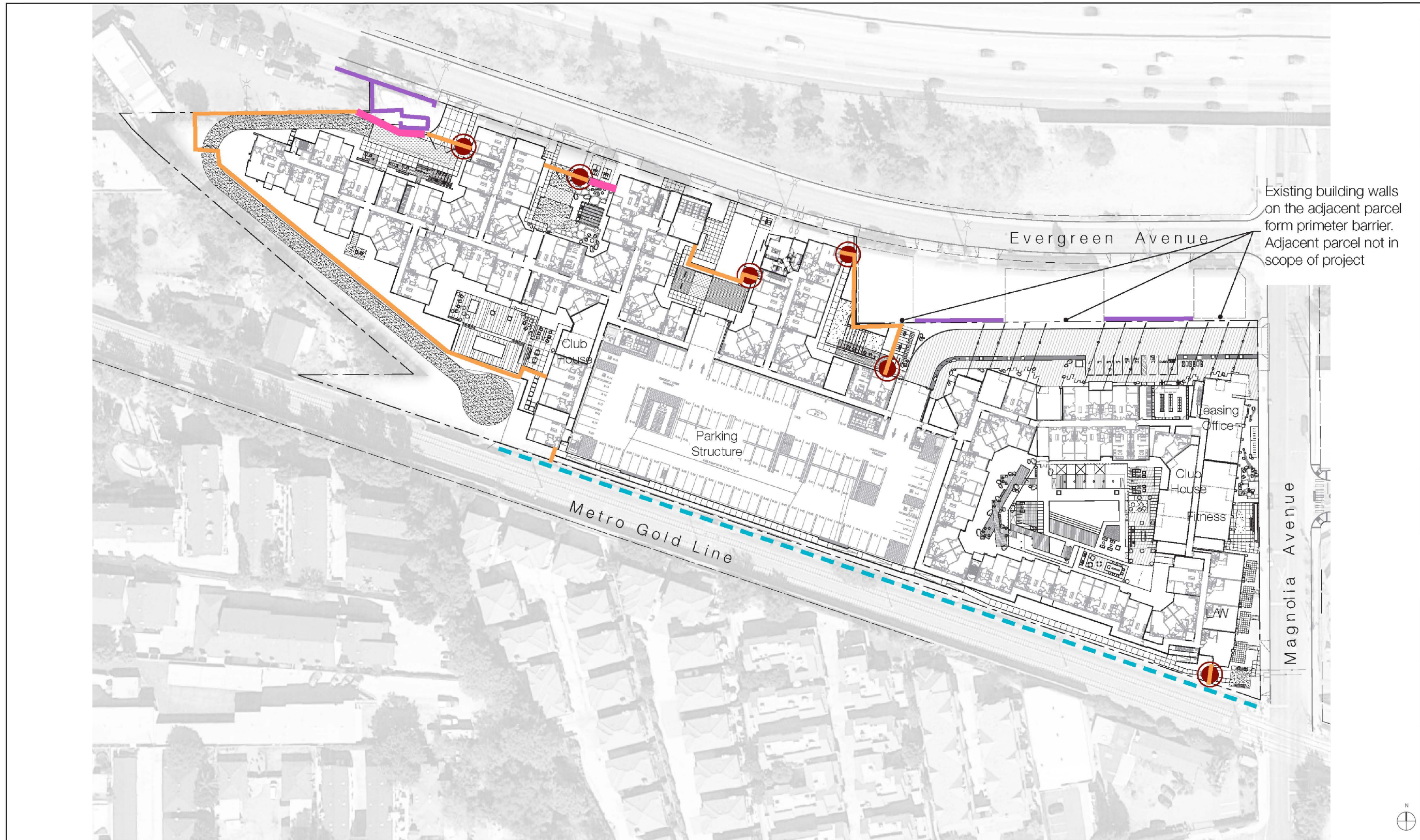
**Figure 3-10 Specific Plan Landscape Plan**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project



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Source: TCR, 2019

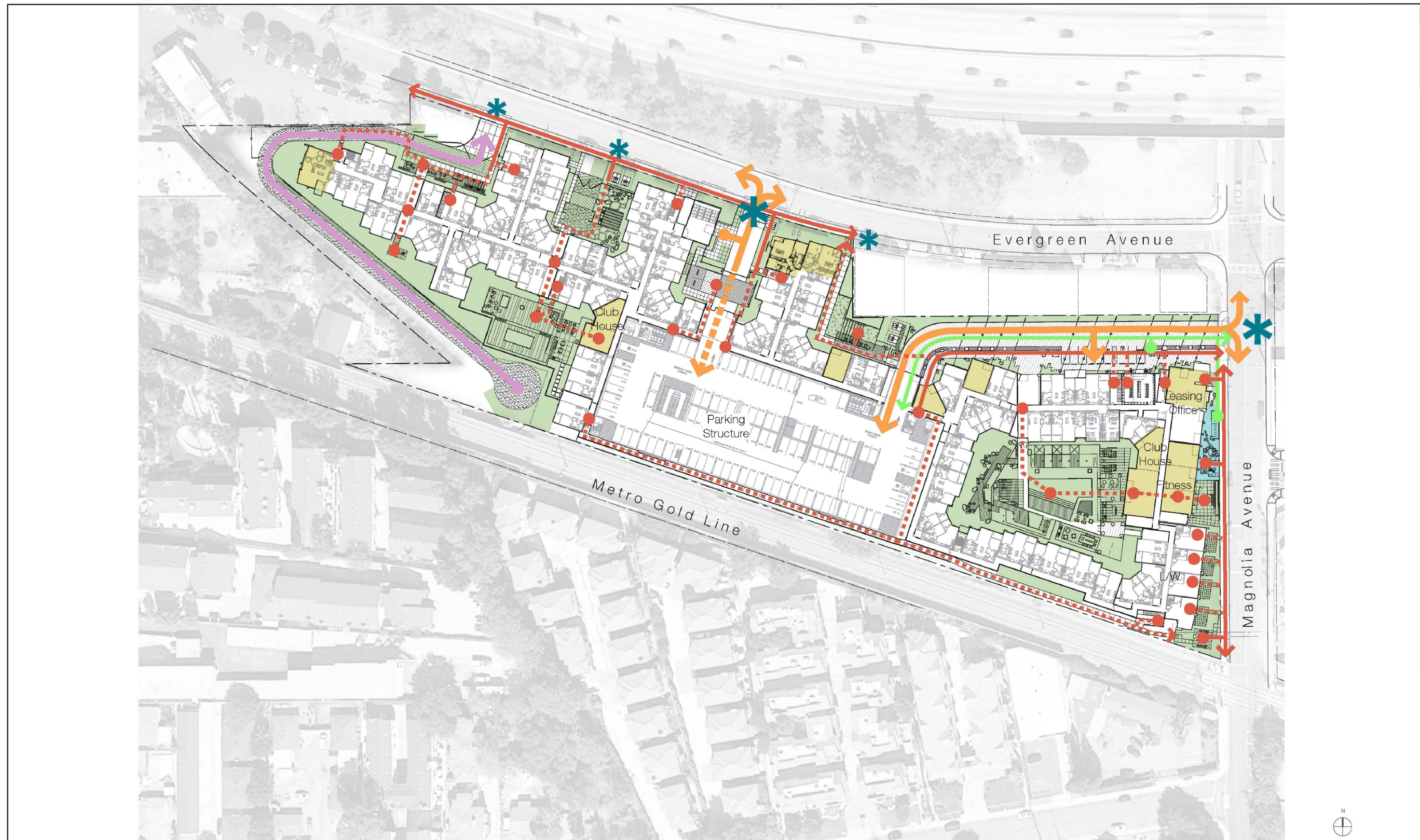
- Steel Fence (6' max)
- Existing Metro Fence (to remain)
- Private Pedestrian Gate
- Screen Wall (6' max)
- Existing Block Wall (6')

**Figure 3-11** Specific Plan Perimeter Walls and Fencing

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: TCR, 2019

- |                   |                              |                      |                     |                         |                 |
|-------------------|------------------------------|----------------------|---------------------|-------------------------|-----------------|
| Open Space        | Roof Deck/Interior Amenities | Pedestrian (Public)  | Vehicular (Private) | Vehicular (Maintenance) | Secondary Entry |
| Public Open Space | Bicycle (Public)             | Pedestrian (Private) | Vehicular (Public)  | Primary Entry           |                 |

**Figure 3-12** Specific Plan Mobility Plan

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Map of Photo Locations



**Photo 1.** Standing on corner of Magnolia and METRO Gold Line, looking west at southeast corner of Alexan Foothills Specific Plan area



**Photo 2.** Standing on the corner of Magnolia Avenue and Evergreen Avenue, looking west along Evergreen Avenue. Northern boundary of the Alexan Foothills Specific Plan is on the left of the photo.



**Photo 3.** Standing on corner of Magnolia Avenue and METRO Gold Line, looking northeast. MODA at Monrovia Station apartments are on the right of the photo.



**Photo 4** Standing on the corner of Evergreen Avenue and Mayflower Avenue, looking south along Mayflower Avenue at residences on the west side of Mayflower Avenue.



**Photo 5.** Standing on Genoa Street, looking north. Alexan Foothills Specific Plan area in background.



**Photo 6.** Standing on Genoa Street, looking north. Alexan Foothills Specific Plan area in background.



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Source: TCR, 2019

**Figure 3-14** Specific Plan 3D Rendering 1: Looking South Along Magnolia

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-15** Specific Plan 3D Rendering 2: Looking North Along Magnolia

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-16** Specific Plan 3D Rendering 3: Looking West From Pomona

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-17** Specific Plan 3D Rendering 4: Looking Southwest Along Evergreen

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-18** Specific Plan View Simulation 1: Existing Buildings

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-19** Specific Plan View Simulation 1: Existing Buildings with Proposed Buildings

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: TCR, 2019

**Figure 3-20** Specific Plan View Simulation 2: Existing Buildings

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-21** Specific Plan View Simulation 2: Existing Buildings with Proposed Buildings

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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Source: TCR, 2019

**Figure 3-22** Specific Plan View Simulation 3: Existing Buildings

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: TCR, 2019

**Figure 3-23** Specific Plan View Simulation 3: Existing Buildings with Proposed Buildings

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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## **4. INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS**

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### **4.1 EVALUATION OF IMPACTS**

Pursuant to CEQA, this EIR evaluates the environmental impacts associated with the Project and identifies mitigation measures to reduce significant impacts to less than significant levels, if feasible. The Project includes the following components: General Plan Amendment (GPA), Zoning Code Amendment (ZCA), and the Alexan Foothills Specific Plan.

The entire 9.63-acre Project area is proposed for a GPA from Manufacturing to Planned Development Area (PD-27: Station Square West). The ZCA will establish a Planned Development Area (PD-27: Station Square West [PD-27]) for the entire 9.63-acre Project area in order to be consistent with the GPA. A zone change for 2.86 acres is proposed from Manufacturing to a Planned Development Area to include high density residential development as well as other uses identified in PD-27 for Areas A and C (ZCA Areas A and C). The Alexan Foothills Specific Plan is proposed on a 6.77-acre site located within ZCA Area B.

#### **Program- and Project-Level Environmental Analysis**

This EIR generally includes a programmatic analysis of the PD GPA and PD ZCA Areas A and C, and a project-level analysis of the Alexan Foothills Specific Plan (ZCA Area B). Each of the environmental analysis chapters will clearly state the type of analysis provided for each environmental topical impact area. With respect to ZCA Areas A and C, the precise design and impacts associated with future development within the ZCA areas are unknown at this time, and, as noted above, are examined at a programmatic level of detail in this EIR. Environmental review of subsequent individual actions within the ZCA Areas A and C would be undertaken at a later time, if and when such proposals come before the City in the form of a site-specific development application or improvement project.

#### **4.1.1 Impact Assessment Baseline**

CEQA Guidelines Sections 15125(a) and (e) provide that the existing environmental setting (the environmental conditions in the project vicinity at the time the environmental analysis is begun) should constitute the baseline physical conditions by which it is determined whether an impact is significant. Pursuant to this guideline, all impact assessments in this EIR are based upon comparison of the projected future "With Project" conditions (i.e., buildout of ZCA Areas A and C and the Alexan Foothills Specific Plan) with the existing environmental setting rather than with the future "Without Project" condition.

#### **4.1.2 Impact Assessment Assumptions**

The purpose of this EIR is to evaluate the likely environmental consequences of the Project, as described in Chapter 3, and to identify mitigation measures and alternatives that could minimize or avoid potentially significant adverse environmental impacts and/or to increase beneficial effects. The EIR assumes full buildout of the Project (GPA, ZCA Areas A and C, and the Alexan Foothills Specific Plan) as described in Chapter 3, through the year 2030, consistent with the City's existing General Plan.

Since the release of the Notice of Preparation (NOP) for the Project, CEQA and the CEQA Guidelines were revised effective December 28, 2018. Recent changes to CEQA and the CEQA Guidelines, including new language in the Environmental Checklist Form (Appendix G of the CEQA Guidelines) are used in this document.

## 4.2 “SIGNIFICANT IMPACTS” AND OTHER KEY EIR TERMINOLOGY

This EIR identifies the “significant impacts” of the Project and corresponding mitigation measures that would avoid or reduce those impacts to a less than significant level. Where it is determined in this EIR that a particular impact cannot be avoided or reduced to a less than significant level by the identified mitigation measures, the EIR identifies that impact as a “significant unavoidable impact.” Significant unavoidable impacts are also discussed in Chapter 22 (CEQA Mandated Sections) of this EIR. These terms (“significant,” “unavoidable,” “mitigation”) and other key CEQA terminology used in this EIR are defined in the subsequent table (Table 4-1).

**Table 4-1 Definitions of Key EIR Terminology**

<b>Significant/Potentially Significant Impact</b>	"Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant. (CEQA Guidelines, Section 15382).
<b>Significant Cumulative Impact</b>	"Cumulative impacts" are defined as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (CEQA Guidelines, Section 15355).
<b>Unavoidable Significant Impact</b>	"Unavoidable significant impacts" are defined as those significant adverse environmental impacts for which either no mitigation or only partial mitigation is feasible. If a project is to be approved that will result in the occurrence of significant effects which are identified in the EIR but are not avoided or substantially lessened, the Lead Agency must include in the record of the project approval a written statement of the specific reasons to support its action (i.e., a "statement of overriding considerations") (CEQA Guidelines, Sections 15126.2[b] and 15093[b]).
<b>Significance Criteria</b>	The criteria used in this EIR to determine whether an impact is or is not " <i>significant</i> " are based on (a) CEQA-stipulated "mandatory findings of significance" (i.e., where any of the specific conditions occur under which the Legislature and the Secretary of Resources have determined to constitute a potentially significant effect on the environment, which are listed in CEQA Guidelines Section 15065); (b) specific criteria that a Resources Agency has determined are "normally" considered to constitute a "significant effect on the environment;" (c) the relationship of the project effect to the adopted policies, ordinances and standards of the Lead Agency and of responsible agencies; and/or (d) commonly accepted practice and the professional judgment of the EIR authors and

	Lead Agency staff.
<b>Mitigation Measures</b>	For each significant impact, the EIR must identify a specific "mitigation" measure or set of measures capable of (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) reducing or eliminating the impact over time by preservation or maintenance operations during the life of the action; or (e) compensating for the impact by replacing or providing substitute resources or environments. (CEQA Guidelines, Section 15370).

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GPA	General Plan Amendment
NOP	Notice of Preparation
PD	Planned Development
ZCA	Zoning Code Amendment

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## **5. AESTHETICS AND VISUAL RESOURCES**

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This EIR Chapter describes existing visual and scenic resources in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

### **5.1 SETTING**

The environmental and regulatory setting of the Project area with respect to aesthetics and visual resources is described based on local, state and federal regulations.

#### **5.1.1 Environmental Setting**

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 Monrovia slopes to the south from the foothills. The San Gabriel Mountains are the most dominant visual feature in Monrovia and serve as a backdrop of views to the north. The mountains are visible from most parts of Monrovia and are most notable along north-south arterial roadways, such as Myrtle Avenue.

The Project is located within the southern part of the City and contains a variety of uses built primarily in the post-World War II era including light industrial structures, a religious building, a commercial office building, single family residences, and an asphalt covered storage lot. The existing buildings are single-story, typical of the post-war era, and have limited aesthetic value.

The area immediately north of the Project (i.e., north of West Evergreen Avenue) comprises a narrow strip of vacant Caltrans Right-of-Way containing vegetative screening, and then Interstate-210 (I-210). There are no scenic highways near the Project.

The area immediately to the east of the Project (i.e., east of Magnolia Avenue) currently comprises a mix of single-story industrial buildings and single-story single-family residences, as well as the MODA apartments, a new 5-story multi-family apartment complex recently constructed as seen in site photos and shown in 3D renderings of the Alexan Foothills Specific Plan contained in Chapter 3. The MODA apartment buildings vary in height between 44 feet and 75 feet. Their building design reflects a contemporary architectural style. The articulation of horizontal and vertical surfaces, fenestration and openings, color, texture, and the use of varied materials reduce the appearance of undifferentiated massing. Exterior materials consist of a mix of metal, ceramic tile, and textured stucco. The remaining existing residential and industrial areas immediately east of the Project are also proposed for new multi-family residential development of similar height and style as shown in 3D renderings of the Alexan Foothills Specific Plan.

The area immediately south of the Project comprises the light rail tracks of the METRO Gold Line and then high-density residential development comprising a mix of single-story, two-story, single-family, and multi-family residences (including townhouse complexes). This residential neighborhood consists of a mix of post-World War II era and modern stucco homes as seen in site photos in Chapter 3.

The area immediately west of the Project, west of Mayflower Avenue, comprises medium density residential development primarily comprising single-story, and two-story stucco apartment buildings and single-family homes.

Sources of nighttime lighting in areas near the Project include lighting of building interiors, security lighting (i.e., for parking lots), street lights, lighting of the I-210, and headlights along roadways and the I-210. Daytime glare is produced by the use of reflective materials, such as reflective glass and metals, in building exteriors. Glare from car headlights can also occur at night. Windows and materials in existing buildings are potential sources of glare in the Project area, but there are no known issues with glare from existing buildings. Headlights from the I-210 are also a known potential source of glare in the Project area, but the I-210 is elevated from the base elevation of the Project site by approximately 30 feet. Therefore, glare from car headlights are not likely to impact existing land uses in the Project area.

### **5.1.2 Regulatory Setting**

#### **Federal**

##### ***National Scenic Byways Program***

The National Scenic Byways program is part of the U.S. Department of Transportation, Federal Highway Administration. The program was established under the Intermodal Surface Transportation Efficiency Act of 1991 and was reauthorized in 1998 under the Transportation Equity Act for the 21st Century. Under the program, the U.S. Secretary of Transportation recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities. The only National Scenic Byway located within southern California is the Arroyo Seco Historic Parkway – Route 110 in Los Angeles County. The National Scenic Byway is not located near the Project.

#### **State**

##### ***State Scenic Highway Program***

The State Scenic Highway Program, created by the California Legislature in 1963, was established to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. A scenic highway is designated under this program when a local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a Scenic Highway. When a City or County nominates an eligible scenic highway for official designation, it defines the scenic corridor, which is land generally adjacent and visible to a motorist on the highway. State Laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. There are no State Scenic Highways in the vicinity of the Project.

#### **Local**

##### ***Monrovia General Plan***

The following policies of City of Monrovia's General Plan Land Use Element are applicable to the Project:



- **Policy 4.1:** Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.
- **Policy 4.2:** Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed project.
- **Policy 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 13.3:** In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.

### ***Monrovia Zoning Code***

Section 17.32.080 of the Monrovia Zoning Code requires that lighting, where provided to illuminate private property, must be arranged to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment. Section 17.32.090 of the Zoning Code relates to glare. Specifically, no direct or reflected glare shall be visible from the property boundary line. Sky-reflected glare shall not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs.

The Monrovia Zoning Code (Section 17.12.010[G][9]) defines “sensitive areas” requiring visual impact analyses for new development in areas “which are higher in elevation and visually exposed to the city-at-large and could potentially impact existing city-at-large view sheds,” however, these areas are only defined in hillside areas. Otherwise, the Zoning Code has no definition of a scenic vista.

### ***Monrovia Neighborhood Compatibility Design Review Process***

Section 17.12.005 of the Residential Development Standards in the Monrovia Zoning Code requires Neighborhood Compatibility Design Review for all proposed new residential units, and additions affecting a certain percentage of the existing structure, in a residential zone or a PD Zone designated for residential development to ensure that such structures are found to be compatible with the neighborhood within which it is located. The purpose and intent of the City’s design review process is as follows:

- (A) *Purpose and intent. The preservation of the character of Monrovia’s neighborhoods is an important goal for the community. The purpose of this chapter is to integrate new development into the context and character of existing neighborhoods to achieve compatibility. The tools implemented to address compatibility area intended to provide an approach that balances the desires of the property owner to develop his or her property with the concerns of surrounding residents to maintain the character of their neighborhood.*

- (1) *The purpose and intent of the neighborhood compatibility design review is:*
  - (a) *To preserve the character and charm of the city and its neighborhoods by establishing processes and criteria to review new construction to assure that the resulting structures are compatible with the neighborhood within which they are located.*
  - (b) *To provide reasonable review of proposals to maximize compatibility with the unique character of the neighborhood in terms of mass, scale, height, and design, while generally maintaining neutrality regarding the architectural style of the proposed development.*
  - (c) *To minimize privacy impacts of new two-story construction upon neighboring properties while still maintaining good design.*
  - (d) *To provide a review process to regulate the development or redevelopment of properties within existing neighborhoods so as to maximize visually compatible relationships, and bright, open neighborhoods.*
  - (e) *To educate applicants regarding their obligation to take into consideration the potential impacts on their neighbors when modifying structures or proposing new structures and take reasonable steps to mitigate such impacts.*
- (2) *It is not the intent of this chapter to unreasonably restrict or regulate the right of an individual property owner to determine the type of structure or addition desired.*
- (3) *The neighborhood compatibility design review process is intended to be an integral part of the overall design process that should commence with the city staff and the applicant prior to the preparation of any design concepts.*
- (4) *The regulations in this section are in addition to the requirements of other regulations or ordinances of the city and where in conflict the more restrictive regulations shall apply.*

According to Section 17.12.005 of the Residential Development Standards in the Monrovia Zoning Code, the City's Design Review Committee shall review applicable developments for neighborhood compatibility using the following criteria:

- (1) *Exterior material review.*
  - (a) *Building materials and finishes on exterior surfaces;*
  - (b) *Architectural integrity of the proposed project.*
- (2) *Site planning/site design.*
  - (a) *Orientation of the building(s) on the site and in relation to surrounding property improvements, including entrances, parking areas, and driveways;*
  - (b) *Garage and parking locations, driveway and driveway approach locations;*
  - (c) *Onsite building relationships;*
  - (d) *Landscaping.*
- (3) *Building form.*
  - (a) *Roof designs and materials;*
  - (b) *The height and building profile of the structures;*
  - (c) *Mass, bulk, modulation, scale and articulation.*
- (4) *Architectural features/design. All exterior facade and architectural features including window types, entrance areas, porches, chimneys, and the use of building modulation.*

(5) *Neighbor impact review.*

- (a) *The scale and bulk of the building(s) in relationship to the neighboring properties, including the location and orientation of second stories;*
- (b) *Reasonably minimizes privacy impacts;*
- (c) *Solar access;*
- (d) *Grade differential.*

(6) *Neighborhood compatibility review.*

- (a) *Relationship of development to the surrounding neighborhood such as appropriate mass, architectural features, scale, and building materials;*
- (b) *Prevailing/predominant development patterns.*

## 5.2 ENVIRONMENTAL EFFECTS

This Section describes potential impacts to sensitive aesthetic or visual resources that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### 5.2.1 Significance Criteria

Based on the CEQA Guidelines, Appendix G: Items I (a) through (d), implementation of the Project would have a significant impact related to aesthetics and visual resources if it would:

- (a) Have a substantial adverse effect on a scenic vista;
- (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- (c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site or its surroundings (public views are those that are experienced from publicly accessible vantage points); or
- (d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The Project qualifies as a mixed-use residential project on an infill site within a Transit Priority Area (TPA), as discussed in Chapter 3, and therefore, falls under Sections 21099(d)(1) and (2) of CEQA which state:

*“(d)(1) Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.*

*(2) (A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies.*

*(B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.”*

### **5.2.2 Analysis Methodology**

The following definitions are used in the impact analysis on aesthetics and visual resources for the Project:

**Scenic Vista.** A “scenic vista” is not defined in CEQA or the Monrovia Municipal Code or General Plan. For the purposes of this analysis, a scenic vista is defined as “a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public providing or relating to views of impressive or beautiful natural scenery where a vista is defined as ‘a distant view through or along an avenue or opening.’”

**Scenic Resources.** “Scenic resources” are referred to in CEQA as “trees, rock outcroppings, and historic buildings within view from a state scenic highway.” A “scenic resource” is not defined in the Monrovia Municipal Code or General Plan. For the purposes of this analysis, a “scenic resource” is defined as a state scenic highway, National Scenic Byway, National Scenic Trail, National Scenic Area, or state or federal designated natural or wilderness area.

**Glare.** According to the American National Standards Institute (ANSI)/Illuminating Engineering Society (IES) RP-16-17 Nomenclature and Definitions for Illuminating Engineering, glare is defined as “The sensation produced by luminances within the visual field that are sufficiently greater than the luminance to which the eyes are adapted to cause annoyance, discomfort, or loss in visual performance or visibility” where “The magnitude of the sensation of glare depends on such factors as the size, position and luminance of a source; the number of sources; and the luminance to which the eyes are adapted.”

The methodology for evaluating potential environmental impacts on aesthetics and visual resources followed this basic sequence:

- (1) City documents were reviewed to identify existing environmental conditions and problems related to aesthetics and visual resources, including the regulatory framework that applies to these issues.
- (2) View simulations were prepared for the Alexan Foothills Specific Plan and used for the impact analysis on public views of scenic vistas. Visual simulations are shown in Chapter 3 and included in the plan set for the Alexan Foothills Specific Plan contained in Appendix M.
- (3) 3D Renderings were prepared for the Alexan Foothills Specific Plan and used for the impact analysis on visual character. 3D Renderings are shown in Chapter 3 and included in the plan set for the Alexan Foothills Specific Plan contained in Appendix M.
- (4) A shade and shadow analysis was conducted for the Alexan Foothills Specific Plan and used for the impact analysis on light, glare, shade, and shadows. The result of the shade and shadow analysis are shown in Figures 5-1 through 5-10 and included in the plan set for the Alexan Foothills Specific Plan contained in Appendix M.

- (5) The CEQA Statute and Guidelines, including Appendix G (Environmental Checklist Form), were consulted to identify environmental impact topics and issues that should be addressed.
- (6) The Project was analyzed to determine if any significant impacts to aesthetics and visual resources would occur.
- (7) For potential environmental impacts, mitigation measures were designed to avoid or reduce each impact to a less than significant level, where possible.

### **5.2.3 Environmental Impacts**

#### **IMPACT AES-1 IMPACTS ON SCENIC VISTAS**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (e.g., development on a scenic hillside).

As stated above, Section 17.12.010 of the Monrovia Municipal Code provides development standards for protection of scenic vistas; however, these are applicable only to hillside areas (Residential Foothill Zone) where views are more pronounced due to topography. As discussed above, for the purposes of this analysis, a scenic vista can be defined as “a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public providing or relating to views of impressive or beautiful natural scenery where a vista is defined as ‘a distant view through or along an avenue or opening.’” A “substantial adverse effect” would involve a significant interruption of a public panoramic view.

Development in the Project area would not have a substantial adverse effect on a scenic vista, as the Project vicinity is an urbanized environment that does not afford expansive scenic views and has no aesthetic features such as prominent ridges. The Project site is relatively flat. Limited views of the San Gabriel Mountains, approximately two miles to the north, are available along Magnolia and Mayflower Avenues, Duarte Road, and the METRO Gold Line as shown in view simulations in Chapter 3, Figure 3-18 to Figure 3-23. However, these views are often obscured by street trees, existing buildings, and other structures. Therefore, impacts on scenic vistas from buildout of the Project would be less than significant.

#### **Mitigation Measures**

No mitigation measures are required.

#### **IMPACT AES-2 IMPACTS ON SCENIC RESOURCES**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

No scenic resource would be impacted by the Project. A section of the I-210 is eligible for state highway designation, however, this eligible section is west of the City of Monrovia. The City of Monrovia has no local scenic roadways designated in their General Plan, and there are no

scenic resources onsite or adjacent to the Project such as rock outcrops or trees that have scenic value. Therefore, there would be no impact on scenic resources.

## **Mitigation Measures**

No mitigation measures are required.

## **IMPACT AES-3 IMPACTS ON VISUAL CHARACTER**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Alexan Foothills Specific Plan, as well as future residential development within ZCA Areas A and C, would be subject to design review under the Neighborhood Compatibility Design Review process required in the City's Residential Development Standards (Section 17.12.020 of the Monrovia Municipal Code) and described above under 5.1.2, Regulatory Setting.

The following General Provisions 2, 4, and 5 of the new Planned Development PD-27 would apply to all new development in the Project area:

2. *New development shall be designed to be compatible with the Urban Design Objectives outlined in the Land Use Element for the Station Square Transit Village (PD-12) area (i.e., architecture, hardscape, landscape). New developments shall be designed to minimize massing and provide for articulation and design variety to enhance the pedestrian realm (i.e., include a pedestrian-scaled façade, provide easily identifiable pedestrian access to building entrances, etc.).*
4. *New development located adjacent to or facing residential neighborhoods south of the Gold Line light rail tracks shall be designed to minimize potential adverse impacts, including light, glare, noise, and building mass.*
5. *New development with frontage on Magnolia shall incorporate streetscape that compliments Station Square Transit Village (PD-12), including architectural massing, character, and the pedestrian environment.*

In addition, the following specific provision applies to ZCA Area B in PD-27:

5. *High-quality exterior building design (signature architecture) shall be a primary consideration in the approval of a new development.*
  - a. *If mixed-use developments are proposed, they shall: incorporate neighborhood-serving ground floor commercial space with frequent sidewalk entrances to promote pedestrian activity along the street; include communal and private open space for residents; make ground floor commercial uses visually distinct from the residential above; distinguish residential entrances from commercial entrances; and incorporate upper floor balconies, bays, and windows that overlook the street into residential units to enliven the street elevation.*
  - b. *If multi-family developments are proposed, they shall: introduce variation in façade and height to reduce building bulk; articulate building facades to portray a domestic scale and give identity to individual dwelling units; and orient building entrances towards the street.*



The Project area is currently comprised of one-story post-World War II structures. The Project area is surrounded on three sides by a mix of one- and two-story post-World War II era and modern stucco homes and apartments, with the exception of the MODA apartments, a 5-story apartment complex recently constructed along S. Magnolia near the METRO Gold Line tracks (as seen in photographs and 3D renderings shown in Chapter 3). The height, as well as the mass, bulk, and scale of future structures in the Project area, including the Alexan Foothills Specific Plan, have the potential to be inconsistent with the style and scale of existing one- and two-story buildings in the neighborhood. Development in ZCA Areas A and C also has the potential to introduce building styles, materials, and colors to the area that are not compatible with the existing visual character of the neighborhood. Therefore, impacts of development in the Project area has the potential to have an adverse and significant impact on the visual character of the neighborhood.

The Alexan Foothills Specific Plan was intentionally designed to break up the proposed buildings into smaller “neighborhoods” surrounding individual courtyards to reduce the scale of the project and to maximize the compatibility of it with the surrounding community. Each building’s articulation, materials, and colors have also been designed to break up the building massing to maximize compatibility with the neighborhood as well. Finally, the Alexan Foothills Specific Plan was designed to comply with Specific Provision No. 5 of the Specific Plan to introduce variation in the building façades and building heights to reduce building bulk; to articulate building facades to portray a domestic scale and give identity to individual dwelling units; and to orient building entrances towards the street.

General Provisions 2, 4, and 5 would also ensure that future structures in ZCA Areas A and C are also designed to maximize compatibility with the visual character of the neighborhood. Specific Provisions within each ZCA Area also would ensure that new structures are designed to maximize compatibility with the neighborhood. Nevertheless, without Design Review, new development under the Project could result in the introduction of structures into the Project area that would not be consistent with the visual character of the neighborhood. Mitigation measure MM AES-1 however, ensures that Design Review would be completed for all future development in the Project area. Therefore, with implementation of Design Review, impacts on the visual character of the neighborhood would be less than significant.

Finally, use of noise barriers and/or walkways during construction of the Alexan Foothills Specific Plan or buildout of ZCA Areas A and C have the potential to affect the visual character of the area over the short-term should the construction barriers or walkways not be properly maintained (e.g., become sites of graffiti or trash). Short-term impacts would be potentially significant. However, mitigation measure MM AES-2 would ensure that construction barriers and/or walkways are maintained and that any inappropriate material is removed.

### **Mitigation Measures**

Mitigation measure MM AES-1 and MM AES-2 are applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM AES-1: Neighborhood Compatibility Design Review.** To ensure compatibility with the surrounding residential neighborhood, all future development in the PD-27 area, including non-residential development, shall undergo the Neighborhood Compatibility Design Review process outlined in Section 17.12.005 of the Residential Development Standards in the Monrovia Zoning Code. **Plan Requirements and Timing:** Prior to construction of future development in the PD-27 area, the development must complete the Neighborhood Compatibility Design Review

process as outlined in Section 17.12.005 of the Monrovia Zoning Code. **Monitoring:** City staff shall ensure completion of the Design Review process prior to granting land use clearance for future development.

**MM AES-2: Maintenance of Construction Barriers.** Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours." **Requirements and Timing:** Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

## **IMPACT AES-4 LIGHT, GLARE, SHADE AND SHADOWS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

**Light and Glare.** Nighttime illumination of outdoor areas can affect people in several ways. For example, where intense lighting is viewed against a dark background, the contrast attracts the attention of the viewer and could be considered a nuisance (City of Monrovia 2008). Under low-light conditions, the human eye adjusts to the brightest light within the field of view. If the range of light intensity to which the eye is exposed is large, the eye will be relatively insensitive to the more dimly lighted areas within the field of view. In addition, increased illumination can affect the suitability of sleeping areas, use of outdoor areas at natural light levels, and privacy (City of Monrovia 2008). The degree of impacts may be related to the degree of change from the illumination levels to which people have become accustomed. Typical light sources include street lights, lights to illuminate large surface parking lots, light emitted from the interiors of buildings and residences, and headlights on roadways.

Glare is the discomfort or impairment of vision experienced when the image is excessively bright in relation to the general surroundings (City of Monrovia 2008). Glare created by lighting systems can be measured for impairment of view. A typical example of the effects of glare is automobile headlights. When viewed directly in front of a vehicle with the headlights on full beam, vision is impaired, resulting in disabling glare. However, when viewed from behind the light source, the same headlights would not impair vision. Glare is also produced by large glass structures or other reflective building materials. Glare can affect both day and nighttime views.

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

- Excessive or inappropriately directed lighting that can adversely impact nighttime views by reducing the ability to see the night sky and stars.

- Glare caused from unshielded or misdirected lighting sources, such as a floodlight attached to the side of a single-family residence that could be oriented to shine into a neighbor's house.
- Reflective surfaces (e.g., polished metal) or reflective windows that can also cause glare that could impact nearby residences or people traveling along the I-210 or roadways adjacent to the development.

Section 17.32.080 of the Monrovia Municipal Code requires that lighting, where provided to illuminate private property, be arranged to reflect away from adjoining property or any public way and be arranged in a manner not to cause a nuisance either to highway traffic or the living environment. Buildout of the Project area is required to comply with this standard. In addition, the City's design review process would ensure that these standards would be complied with and that reflective building materials that would introduce a source of glare would not be utilized.

The Alexan Foothills Specific Plan requires the following lighting standards:

- A lighting plan shall be submitted for the Planning Division's review and approval, and shall demonstrate that:
  - Lighting levels are sufficient to provide for pedestrian safety and security, and the security of parked vehicles, but not in any manner that adversely impacts adjacent properties and roadways.
  - Lighting is located to assure adequate light levels and create an even level of illumination.
  - Exterior lighting is architecturally integrated with the building style, materials, finishes, and colors.
  - **Residential Areas.** All exterior residential lighting shall be designed to be decorative and unobtrusive. Lighting shall be designed to avoid glare into neighboring homes, public spaces, or into the night sky. Illumination of common open spaces shall be low profile.
  - **Area Lighting for Pedestrian Walkways and Plazas.** Lighting shall be directed to provide for safety without allowing stray light to intrude into windows of nearby residences or to create glare problems for nearby roadway traffic.
  - **"Hidden Source" Lighting.** For certain prominent architectural features, hidden source lighting can be used to create dramatic effects, illuminating towers or other unique architectural features. Such lighting can be concealed in soffits, behind ledges or parapets, or set into landscape areas with the light directed at the element to be highlighted. Use of low, bollard-type lighting and/or landscape accent lighting is encouraged, especially in pedestrian areas.

Nevertheless, lighting from the proposed parking structure under the Alexan Foothills Specific Plan has the potential to direct light down to residences in adjacent areas to the south of the METRO tracks. Other sources of light associated with the Alexan Foothills Specific Plan (e.g., pathway lighting, lighting of signage) also have the potential to direct light inappropriately. In addition, other developments in the Project area (i.e., in ZCA Areas A and C) have the potential to introduce sources of light or glare that could be a nuisance to nearby residents or people traveling on roadways adjacent to the development. Therefore, buildout of the Project could generate a significant impact on aesthetics and visual resources in relation to glare and lighting if mitigation measures are not implemented. Therefore, implementation of mitigation measure MM AES-1 as well as mitigation measures MM AES-3 and MM AES-4 are required to reduce these potential impacts associated with light and glare to less than significant levels.

**Shade and Shadow.** A purpose and intent of the City’s design review process is “To provide a review process to regulate the development or redevelopment of properties within existing neighborhoods so as to maximize visually compatible relationships, and bright, open neighborhoods.” (Section 17.12.005[A][1][d] of the Monrovia Municipal Code). A shade and shadow analysis was performed for the proposed development under the Alexan Foothills Specific Plan to determine whether the development would cast shade or shadows on the adjacent residential community to determine if the development would continue to allow for a “bright, open neighborhood.” Modeling was performed to determine worst-case scenario effects which would occur mid-day on the summer solstice and fall solstice. Results of the shade and shadow analysis are shown in Figures 5-1 through 5-10 as well as in the plan set contained in Appendix M, and indicate that the proposed development under the Alexan Foothills Specific Plan would cast shade and shadows on either existing roadways or on a small portion of an existing parking lot for an industrial use outside of the Alexan Foothills Specific Plan area, and only during certain times of the year under a worst-case scenario. Therefore, the development would have a negligible shade and shadow effect on the neighborhood.

However, other developments in the Project area (i.e., in ZCA Areas A and C) have the potential to have adverse shade and shadow effects on the neighborhood. Mitigation measure MM AES-1, however, ensures that Design Review would be completed for all future development in the Project area. Therefore, with implementation of Design Review, shade and shadow impacts on the neighborhood would be less than significant.

### **Mitigation Measures**

Mitigation measures MM AES-3 and MM AES-4 are applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C. In addition, please refer to mitigation measure MM AES-1.

**MM AES-3:** Lighting shall be directed and shielded to focus illumination onto the desired areas only and avoid light trespass into adjacent areas. Reflective glass, metallic, and other highly reflective and glare producing materials, shall not be used in new building construction. **Requirements and Timing:** Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic site inspections during construction.

**MM AES-4: Comprehensive Lighting Plan.** Prior to issuance of a building permit, the applicant shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America [IESNA]) and shall be in compliance with applicable standards of the City’s Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, onsite driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer:

- Exterior onsite lighting shall be shielded and confined within site boundaries.
- No direct rays or glare are permitted to shine onto public streets, freeways or adjacent sites.

- Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted.
- The site shall not be excessively illuminated based on the illumination recommendations of the IESNA.

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

#### **5.2.4 Impact Conclusions**

With implementation of the mitigation measures above, potentially significant impacts on aesthetics and visual resources would be reduced to less than significant levels.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ANSI	American National Standards Institute
CEQA	California Environmental
EIR	Environmental Impact Report
GPA	General Plan Amendment
IES	Illuminating Engineering Society
IESNA	Illuminating Engineering Society of North America
METRO	Los Angeles County Metropolitan Transit Authority
TPA	Transit Priority Area
ZCA	Zoning Code Amendment

#### **References Cited**

City of Monrovia  
2008 Monrovia General Plan Proposed Land Use and Circulation Elements, Environmental Impact Report (EIR) SCH No. 2007021135. Monrovia, CA. January 2008.

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JUNE 21 10:00 am



SHADE/SHADOW STUDY

DATE: 07.09.19  
JOB NO: 2016-252

ARCHITECTS ORANGE

144 NORTH ORANGE ST., ORANGE, CA 92886  
(714) 639-9860



ALEXAN MONROVIA MONROVIA, CALIFORNIA

TCR  
TRAMMELL CROW RESIDENTIAL

TRAMMELL CROW RESIDENTIAL  
5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
(858) 531-3905

**Figure 5-1** Specific Plan Shade and Shadow Analysis: June 21 10:00 AM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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JUNE 21 11:00 am



SHADE/SHADOW STUDY

N.T.S.

ARCHITECTS ORANGE

144 NORTH ORANGE ST., ORANGE, CA 92886  
(714) 639-9860



DATE: 07.09.19  
JOB NO: 2016-252

ALEXAN MONROVIA MONROVIA, CALIFORNIA

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**Figure 5-2** Specific Plan Shade and Shadow Analysis: June 21 11:00 AM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

JUNE 21 12:00 pm  
 N SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO: 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860



**Figure 5-3** Specific Plan Shade and Shadow Analysis: June 21 12:00 PM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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JUNE 21 1:00 pm

N. SHADE/SHADOW STUDY



N.T.S.

DATE: 07.09.19  
JOB NO: 2016-252

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144 NORTH ORANGE ST., ORANGE, CA 92886  
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**Figure 5-4** Specific Plan Shade and Shadow Analysis: June 21 1:00 PM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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JUNE 21 2:00 pm

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SHADE/SHADOW STUDY  
N.T.S.

DATE: 07.09.19  
JOB NO: 2016-252

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144 NORTH ORANGE ST., ORANGE, CA 92886  
(714) 639-9860



ALEXAN MONROVIA MONROVIA, CALIFORNIA

TCR  
TRAMMELL CROW RESIDENTIAL

TRAMMELL CROW RESIDENTIAL  
5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
(858) 531-3905

**Figure 5-5** Specific Plan Shade and Shadow Analysis: June 21 2:00 PM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

SEPTEMBER 23 10:00 am  
 SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO: 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860



**Figure 5-6** Specific Plan Shade and Shadow Analysis: September 23 10:00 AM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project



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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

SEPTEMBER 23 11:00 am  
 SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO: 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860



**Figure 5-7** Specific Plan Shade and Shadow Analysis: September 23 11:00 AM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL  
 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

SEPTEMBER 23 12:00 pm  
 SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO. 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860



**Figure 5-8** Specific Plan Shade and Shadow Analysis: September 23 12:00 PM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL  
 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

SEPTEMBER 23 1:00 pm  
 SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO: 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860



**Figure 5-9** Specific Plan Shade and Shadow Analysis: September 23 1:00 PM  
 PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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**ALEXAN MONROVIA** MONROVIA, CALIFORNIA  
 TCR TRAMMELL CROW RESIDENTIAL  
 TRAMMELL CROW RESIDENTIAL 5790 FLEET STREET SUITE 140, CARLSBAD CA 92008  
 (858) 531-3905

SEPTEMBER 23 2:00 pm  
 SHADE/SHADOW STUDY  
 DATE: 07.09.19  
 JOB NO. 2016-252  
 N.T.S. ARCHITECTS ORANGE  
 144 NORTH ORANGE ST., ORANGE, CA 92886  
 (714) 639-9860

**Figure 5-10** Specific Plan Shade and Shadow Analysis: September 23 2:00 PM

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project



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## **6. AGRICULTURAL AND FORESTRY RESOURCES**

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This EIR Chapter describes existing agricultural and forestry resources at the Project site. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project and describes potential impacts that could result from the Project.

Information related to Important Farmlands was obtained from the Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008), as well as the following map (California Department of Conservation 2018), located here:

<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>

### **6.1 SETTING**

#### **6.1.1 Environmental Setting**

According to the Farmland Mapping and Monitoring Program of the California Resources Agency (California Department of Conservation 2018), the City of Monrovia, including the Project area, has no land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. According to the Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008), there are no remaining agricultural uses within Monrovia's jurisdiction. Additionally, there are no lands within the City limits, including the Project area, that are held under Williamson Act contracts. The Project area is not zoned as agriculture and no lands are zoned as agriculture within Monrovia.

#### **6.1.2 Regulatory Setting**

##### **Federal**

##### ***Farmland Protection Policy Act (7 United States Code [USC] Section 4201)***

The purpose of the Farmland Protection Policy Act (FPPA) is to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. It also directs Federal programs to be compatible with State and local policies for the protection of farmland. The FPPA does not authorize the Federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners. Projects are subject to FPPA requirements if they irreversibly convert farmland (directly or indirectly) to non-agricultural use and are completed by a Federal agency or rely on assistance from a Federal Agency (USDA 2015).

##### **State**

##### ***California Department of Conservation, Division of Land Resource Protection***

The California Department of Conservation (CDOC) applies the Natural Resources Conservation Service soil classifications to identify agricultural lands. These agricultural designations are used in planning for the present and future of California's agricultural land

resources. Lands classified as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are referred to as “farmland.”

### ***Williamson Act***

The California Land Conservation Act, better known as the Williamson Act, has been the State’s premier agricultural land protection program since its enactment in 1965. Land under a Williamson Act contract is restricted to agricultural uses for a term of no less than 10 years. The Williamson Act is a non-mandated State policy providing for preferential assessment of agricultural and open space lands that meet local size and land use criteria.

### ***Senate Bill (SB) 275***

Senate Bill (SB) 275 created the Agricultural Land Stewardship Program Act of 1995, a CDOC grant program for local governments and nonprofit organizations to aid in the acquisition of agricultural conservation easements. CDOC awards grant funding from the Agricultural Land Stewardship Program fund, which receives revenue from gifts, donations, proceeds from the sale of general obligation bonds, funds appropriated by the Legislature, Federal grants or loans, and other sources.

### **Local**

#### ***City of Monrovia Code of Ordinances, Chapter 17.18 – Angeles National Forest Zone***

In the City of Monrovia jurisdictional limits, all property within the Angeles National Forest contains an Angeles National Forest (ANF) zoning designation. Development within this zone requires approval through the Hillside Development Permit process. However, the Project site is approximately 3 miles south of the Angeles National Forest; therefore, these regulations do not apply to the Project.

## **6.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts on agricultural and forestry resources that could result from the Project. A project-level analysis was conducted for the GPA area, ZCA Areas A and C, and the Alexan Foothills Specific Plan area (ZCA Area B).

### **6.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items II (a) through (e), implementation of the Project would have a significant impact related to agricultural and forestry resources if it would:

- (a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code

section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g]);

(d) Result in loss of forest land or conversion of forest land to non-forest use; or

(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.

## **6.2.2 Environmental Impacts**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

There are no agricultural or forestry resources in the GPA area, ZCA Areas A and C, and the Alexan Foothills Specific Plan or within the surrounding area. Therefore, the Project would not convert farmland or forest land to non-agricultural or non-forest use, would not conflict with existing zoning for agricultural or forest land/timberland use or a Williamson Act contract, and would not impact nearby farmland or forest areas that could result in conversion.

### **Mitigation Measures**

No mitigation measures are required.

## **6.2.3 Impact Conclusions**

The Project would have no impact on agricultural and forestry resources and no mitigation is required.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
ANF	Angeles National Forest
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
FPPA	Farmland Protection Policy Act
PD	Planned Development
SB	Senate Bill
USC	United States Code
USDA	U.S. Department of Agriculture
ZCA	Zoning Code Amendment

## **References Cited**

California Department of Conservation  
2018 Important Farmlands Map for Los Angeles County (July 2017). Sacramento, CA.  
Queried in July 2018.

City of Monrovia

2008 Monrovia General Plan Proposed Land Use and Circulation Elements, Environmental Impact Report (EIR) SCH No. 2007021135. Monrovia, CA. January 2008.



## 8. BIOLOGICAL RESOURCES

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This EIR Chapter describes the existing biological resources in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

A field survey was conducted for the Alexan Foothills Specific Plan (Specific Plan) area by MIG on January 19, 2018. The results of the field survey and the biologists' findings upon which this analysis is based are from the General Biological Resources Assessment provided as Appendix D to this EIR and incorporated herein (MIG 2018). In addition, Helix Environmental Planning Inc. (Helix) conducted a delineation of jurisdictional waters of the State and United States for the Alexan Foothills Specific Plan (Helix 2019); the results of this investigation are also contained in Appendix D and incorporated herein.

### 8.1 SETTING

This Chapter provides an overall description of the existing biological resources within the Project area. A General Biological Resources Assessment Report was prepared for the Alexan Foothills Specific Plan area (Appendix D, MIG 2018) as well as a jurisdictional delineation of waters of the State and United States (Helix 2019). The Monrovia General Plan Open Space Element (City of Monrovia 2018) was used to describe existing biological resources within Zoning Code Amendment (ZCA) Areas A and C. The Open Space Element may be accessed at the following link:

<https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/open-space-element-update>

Pursuant to Section 15150 of the CEQA Guidelines, these documents are herein incorporated by reference into this EIR and either included as an appendix to this EIR, available on the City's website, or available upon request.

#### **8.1.1 Environmental Setting**

The following provides a description of the physical characteristics, vegetation communities and associated wildlife habitats, wildlife movement corridors, sensitive natural communities, special-status species, jurisdictional wetlands, and other waters present or potentially present within the Project area. The Project area encompasses a total of 9.63 acres, which includes the Alexan Foothills Specific Plan area (6.77 acres) and the ZCA Areas A and C (2.86 acres).

#### **Physical Features**

The Project area is flat with elevations ranging between 430-445 feet above mean sea level (AMSL). The Project area is dominated by a parking lot, several industrial buildings, five residential buildings, a church, and an office. The vast majority of the Project area is paved, with very little, mostly weedy vegetation. Interstate-210 and its associated landscaping is located to the north of the Project area. METRO's Gold Line light rail tracks are located directly to the

Project area's south boundary line. Residences occur west and east of the Project area and south of METRO's Gold Line tracks.

A rectangular concrete-lined drainage channel (referred to as Channel A in the Helix 2019 report) crosses the Project area. It initiates near Interstate-210 and drains to the southeast off the Project site to a mapped drainage by the National Wetlands Inventory. This approximately 10-foot wide x 400-foot long open drainage channel runs along the Alexan Foothills Specific Plan's western boundary and flows into a culvert passing under the METRO Gold Line tracks.

## **Vegetation Communities**

The majority of the Project area is unvegetated due to development and characterized by weedy species. Vegetation communities that are present are described in more detail below. A map of the biological resources within the Alexan Foothills Specific Plan area is provided in Figure 8-1; photos of the biological resources present within the Alexan Foothills Specific Plan area are presented in Figure 8-2.

### ***Developed***

The Project area is dominated by paved areas, existing structures, and associated landscaping. These areas are generally unvegetated although weedy species such as wild oats (*Avena fatua*), tree of heaven (*Ailanthus altissima*), castor bean (*Ricinus communis*), Bermuda grass (*Cynodon dactylon*), broad leaf filaree (*Erodium botrys*), and common groundsel (*Senecio vulgaris*) are present.

### ***Ornamental***

Portions of the Project area are characterized by ornamental landscaping, including Siberian elm (*Ulmus pumila*), carob (*Ceratonia siliqua*), ash (*Fraxinus* spp.), crimson bottlebrush (*Callistemon citrinus*), Mexican fan palm (*Washingtonia robusta*), honeysuckle (*Lonicera* spp.), oceanblue morning glory (*Ipomoea indica*), multiflora rose (*Rosa multiflora*), lily of the Nile (*Agapanthus africanus*), and gardenia (*Gardenia* spp.). Weedy species are common in these communities and include smilo grass (*Stipa miliacea*), Bermuda buttercup (*Oxalis pes-caprae*), and wild oats.

### ***Coast Live Oak Trees***

Three coast live oak trees (*Quercus agrifolia*) are present along the western boundary of the Alexan Foothills Specific Plan area and grow along the east edge of the drainage channel. These trees are all over 10" in diameter or more, 2 feet above ground level. Therefore, they are protected by the City of Monrovia Oak Tree Preservation Ordinance. They also are regulated as riparian habitat by California Department of Fish and Wildlife (CDFW) (see below under Federal and State Protected Waters and Wetlands) (Helix 2019).

Additional oak trees occur in the proposed ZCA Areas A and C along and adjacent to the unnamed drainage channel, which may also be regulated as riparian habitat by CDFW.



Source: ESRI 2018, USGS NHD 2018, MIG 2018

- Project Boundary (6.77 ac)
- Culvert Daylight
- Vegetation Community
- Developed (DEV: 6.03 ac)
- Ornamental (ORN: 0.58 ac)
- Coast Live Oak (CLO: 0.16 ac)
- Concrete Lined Ditch (approx. 10 ft wide)



**Figure 8-1** Specific Plan Biological Resources Map

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Photo 1 - Development and structures dominate the Project site. These areas are generally devoid of vegetation.



Photo 2 - In addition to landscape plantings, the ornamental community includes escaped, invasive species like this oceanblue morning glory along the western boundary of the Alexan Foothills Specific Plan area.

## Figure 8-2 Photos of Biological Resources (Page 1 of 2)

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Photo 3 - An unnamed concrete culvert runs along the western boundary of the Alexan Foothills Specific Plan area.



Photo 4 - Coast live oak trees are present along the western boundary of the Alexan Foothills Specific Plan area.

**Figure 8-2** Photos of Biological Resources (Page 2 of 2)

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## Common Wildlife

Wildlife species that have been observed in the Alexan Foothills Specific Plan area and that are likely to occur in the Project area as well include Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), northern mockingbird (*Mimus polyglottus*), American crow (*Corvus brachyrhynchos*), house sparrow (*Passer domesticus*), mourning dove (*Zenaidura macroura*), ruby-crowned kinglet (*Regulus calendula*), and yellow-rumped warbler (*Setophaga coronata*).

Other wildlife species that could inhabit the Project area are limited to urban species adapted to high levels of anthropogenic disturbance. Common urban-tolerant birds include: black phoebe (*Sayornis nigricans*), non-native European Starling (*Sturnus vulgaris*), non-native Eurasian collared dove (*Streptopelia decaocto*) and various other migrant songbirds, such as warblers, vireos, and grosbeaks. Common small mammals expected to occur in the urban setting include, but are not limited to, western gray squirrel (*Sciurus griseus*), raccoon (*Procyon lotor*), California mouse (*Peromyscus californicus*), Virginia opossum (*Didelphis virginiana*), and Botta's pocket gopher (*Thomomys bottae*). The unnamed, concrete drainage channel in the Project area may occasionally provide aquatic habitat to the disturbance-tolerant Sierran treefrog (*Pseudacris sierra*) (formerly Pacific Treefrog [*Pseudacris regilla*] or Pacific Tree Chorus Frog [*Hyla regilla*]), when it contains water.

## Federal and State Protected Waters and Wetlands

As discussed above, an unnamed concrete-lined drainage channel (approximately 10 feet wide) occurs through the Project area along the Specific Plan's western boundary and flows southeast (MIG 2018; Helix 2019). The drainage channel is mapped as a blue-line drainage by the U.S. Geological Survey and is subject to California Department of Fish and Wildlife (CDFW) jurisdiction pursuant to Division 2, Chapter 6, Section 1600 of the Fish and Game Code.

Helix concluded that CDFW jurisdiction consists of nearly vertical concrete walls and concrete bottom within the channel (Helix 2019). The channel was mostly unvegetated, with the exception of an area in the center of the channel where sediment had accumulated on the concrete bottom of the channel (Helix 2019). The majority of the channel does not support soil, except for areas where the concrete lining is cracked and where the embankment collapsed. These large cracks support coast live oak trees directly adjacent to the channel and were included as CDFW jurisdiction since the trees appear to be supported or partially supported by water in the channel (Helix 2019). Based upon the jurisdictional delineation, the channel supports approximately 0.12 acre of CDFW jurisdictional streambed and associated vegetation adjacent to the Alexan Foothills Specific Plan (Helix 2019). Additional CDFW jurisdiction occurs in the channel upstream and to the northwest of the Specific Plan boundary, within the Project area; however, the acreage has not been quantified.

The channel is also subject to U.S. Army Corps of Engineers' (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA) and the Los Angeles Regional Water Quality Control Board (RWQCB) jurisdiction pursuant to Section 401 of the CWA. No other waters or wetlands were observed in the Project area. Based upon the jurisdictional delineation, approximately 0.08 acre (384 lineal feet) of non-wetland waters of the United States subject to USACE and RWQCB jurisdiction occur in the portion of the channel adjacent to the Alexan Foothills Specific Plan area (Helix 2019). As previously noted, additional jurisdictional non-wetland waters of the United States also occur upstream and northwest of the Alexan Foothills Specific Plan boundary in the Project area but has not been quantified.

## **Sensitive Plant Communities**

CDFW and CNPS have identified several native plant communities that are rare and unique to California. While they have no legal, protective status, impacts to these plant communities may be considered “significant” under CEQA. No sensitive plant communities have been observed in the Project area; characteristic attributes of these communities were not present during field surveys of the Alexan Foothills Specific Plan, such as the known distribution and elevation, landscape position, plant species composition, soil and/or substrate type, water chemistry, and/or hydroperiod, nor have they been observed during other site visits or surveys of the Project area during development of the Open Space Element for the City.

## **Special-Status Wildlife**

Special-status wildlife species include those species listed as endangered or threatened under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA); candidates for listing by the U.S. Fish and Wildlife Service (USFWS) or CDFW; species of special concern to the CDFW; and birds protected by the USFWS under the Migratory Bird Treaty Act (MTBA) and/or by the CDFW under Fish and Game Code Sections 3503 and 3513.

During a records search of CDFW’s California Natural Diversity Data Base (CNDDDB) within the nine U.S. Geological Survey (USGS) quadrangles around the Project area, it was initially determined that 43 special-status wildlife species have been recorded in the vicinity of the Project area (CDFW 2018). Of these animal species, none are expected to occur in the Project area (i.e., species ranked as “Not Expected”). Reasons for this include the absence of essential habitat requirements for the species, the distance to known occurrences and/or the species distributional range, the limited availability of foraging and nesting habitat, amount of site disturbance from past and present land uses, and/or the proximity of existing human-related disturbances. In addition, no USFWS-designated critical habitat areas for any federally listed animals are present. A table presenting all special-status animal species considered and evaluated for their potential occurrence on the Project area, including species’ habitat requirements is provided in Appendix D.

### ***Nesting Birds***

Migratory birds are also protected under the Federal MBTA, which prohibits killing any migratory bird or disturbing or destroying an active nest of a migratory bird; this list contains hundreds of birds, including many of which are considered common or even nuisance or non-native species. Nesting birds are also protected under California Fish and Game Code Sections 3503, 3503.5, and 3512, which prohibit the take of active bird nests. Trees in the Project area provide potentially suitable nesting habitat for songbirds or raptors. Although no active nests were observed during the field surveys for the Alexan Foothills Specific Plan, there is potential for ground- and tree-nesting birds to establish nests in the Specific Plan area prior buildout of the Specific Plan. There is also potential for ground- and tree-nesting birds to establish nests in ZCA Areas A and C prior to buildout of these areas. These species are protected under the MBTA and would be protected under the California Fish and Game Code when actively nesting.

## **Special-Status Plant Species**

Special-status plants are defined here to include: (1) plants that are federal- or state-listed as rare, threatened or endangered, (2) federal and state candidates for listing, (3) plants assigned a Rank of 1 through 4 by the CNPS Inventory, and (4) plants that qualify under the definition of "rare" in CEQA, Section 15380.

The Project area was initially determined to provide potentially suitable habitat for a total of 49 special-status plant species based on the Project area's proximity to previously recorded occurrences in the region, vegetation types and habitat quality, topography, elevation, soil types, other species-specific habitat requirements, and geographic ranges of special-status plant species known to occur in the region (CDFW 2018). Based on the CNDDDB record search, and the biological field survey and habitat suitability analysis performed by MIG biologists on the Alexan Foothills Specific Plan site, none of the 49 species are expected to occur (i.e. species ranked as "Not Expected") in the Alexan Foothills Specific Plan area. A table presenting all special-status plant species considered and evaluated for their potential occurrence in the Alexan Foothills Specific Plan area, including plant species' habitat requirements and reported blooming periods, is provided in Appendix D. Due the developed nature of ZCA Areas A and C , these areas are expected to have less potential to support special-status plant species than the proposed Alexan Foothills Specific Plan area.

## **Wildlife Corridors**

Providing functional habitat connectivity between natural areas is essential to sustaining healthy wildlife populations and allowing for the continued dispersal of native plant and animal species. The regional movement and migration of wildlife species has been substantially altered due to habitat fragmentation over the past century. This fragmentation is most commonly caused by development of open areas, which can result in large patches of land becoming inaccessible and forming a virtual barrier between undeveloped areas. Additional roads associated with development, although narrow, may result in barriers to smaller or less mobile wildlife species. Habitat fragmentation results in isolated islands of habitat, which affects wildlife behavior, foraging activity, reproductive patterns, immigration and emigration or dispersal capabilities, and survivability. Wildlife corridors can consist of a sequence of discontinuous areas of habitat such as isolated wetlands, or continuous lineal strips of vegetation and habitat (e.g., riparian strips and ridge lines), or they may be parts of larger habitat areas selected for its known or likely importance to local wildlife.

The Project area does not act as a wildlife movement corridor due to the current built environment at the site as well as the presence of dense urban development surrounding the site including residential neighborhoods, I-210 freeway to the north, METRO rail line to the south, and other commercial development nearby.

### **8.1.2 Regulatory Setting**

The following discussion identifies Federal, State, and local environmental regulations that serve to protect sensitive biological resources.

#### **Federal**

##### ***Federal Endangered Species Act***

The Federal Endangered Species Act (FESA) of 1973, as amended, provides the regulatory framework for the protection of plant and animal species (and their associated critical habitats),

which are formally listed, proposed for listing, or candidates for listing as endangered or threatened under the FESA. The FESA has the following four major components:

- Provisions for listing species;
- Requirements for consultation with the USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service ("NOAA Fisheries Service");
- Prohibitions against "taking" (meaning harassing, harming, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to engage in any such conduct) of listed species; and
- Provisions for permits that allow incidental "take."

The FESA also discusses recovery plans and the designation of critical habitat for listed species. Critical habitat is defined in Section 3(5)(A) of the ESA as:

*"(i) the specific areas within the geographical area occupied by the species on which are found those physical or biological features: (I) essential to the conservation of the species, (II) which may require special management considerations or protection; and (ii) specific areas outside the geographical area occupied by the species upon a determination by the Secretary of Commerce or the Secretary of the Interior (Secretary) that such areas are essential for the conservation of the species."*

Both the USFWS and the NOAA Fisheries Service share the responsibility for administration of the FESA.

### ***The Migratory Bird Treaty Act***

The Federal Migratory Bird Treaty Act ("MBTA") (16 U.S.C. § 703 et seq.), Title 50 Code of Federal Regulations ("CFR") Part 10, prohibits taking, killing, possessing, transporting, and importing of native migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. As used in the act, the term "take" is defined as meaning, "to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires." With a few exceptions, most birds are considered migratory under the MBTA. Disturbance or impacts that causes nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA.

### ***Bald and Golden Eagle Protection Act***

The Bald and Golden Eagle Protection Act that was first passed in 1940 regulates take, possession, sale, purchase, barter, transport, import, and export of any bald or golden eagle or their parts (e.g., nests, eggs, young) unless allowed by permit (16 U.S.C. § 668(a); 50 CFR 22). Take was broadly defined to include shoot, wound, kill, capture, collect, molest, or disturb. In the 1972 amendments, penalties for violations were raised to a maximum fine of \$250,000 for an individual or a maximum of two years in prison for a felony conviction, with a doubling for organizations instead of individuals.



### ***Clean Water Act Sections 404 and 401***

The U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (U.S. EPA) regulate the discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act (CWA) (33 U.S.C. § 1344). Waters of the United States are defined in Title 33 CFR Part 328.3(a) and include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. The lateral limits of jurisdiction in those waters may be divided into three categories – territorial seas, tidal waters, and non-tidal waters – and is determined depending on which type of waters is present (Title 33 CFR Part 328.4[a], [b], [c]). Activities in waters of the United States regulated under Section 404 include fill for development, water resource projects (e.g., dams and levees), infrastructure developments (e.g., highways, rail lines, and airports) and mining projects. Section 404 of the CWA requires a Federal permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).

Section 401 of the CWA (33 U.S.C. § 1341) requires an applicant for a Federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a water quality certification from the State in which the discharge originates. The discharge is required to comply with the applicable water quality standards. A certification obtained for the construction of any facility must also pertain to the subsequent operation of the facility. The responsibility for the protection of water quality in California rests with the State Water Resources Control Board (State Water Board) and its nine Regional Water Quality Control Boards (Water Boards).

### **State**

#### ***California Endangered Species Act***

The State of California enacted similar laws to the FESA, the California Native Plant Protection Act (“NPPA”) in 1977 and the California Endangered Species Act (“CESA”) in 1984. The CESA expanded upon the original NPPA and enhanced legal protection for plants, but the NPPA remains part of the California Fish and Game Code. To align with the FESA, CESA created the categories of “threatened” and “endangered” species. It converted all “rare” animals in the CESA as threatened species but did not do so for rare plants. Thus, these laws provide the legal framework for protection of California-listed rare, threatened, and endangered plant and animal species. The CDFW implements NPPA and CESA, and its Wildlife and Habitat Data Analysis Branch maintains the CNDDDB, a computerized inventory of information on the general location and status of California’s rarest plants, animals, and natural communities. During the CEQA review process, the CDFW is given the opportunity to comment on the potential of the Project to affect listed plants and animals.

#### ***Fully Protected Species and Species of Special Concern***

The classification of “fully protected” was the CDFW’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibian and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at §5515, amphibian and reptiles at §5050, birds at §3511, and mammals at §4700)

dealing with “fully protected” species states that these species “...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species,” (California Fish and Game Commission 1998) although “take” may be authorized for necessary scientific research. This language makes the “fully protected” designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with fully protected species were amended to allow the CDFW to authorize a “take” resulting from recovery activities for State-listed species.

Species of special concern are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing or historically occurred low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologist(s), and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. The designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under CEQA during the project review.

### ***California Fish and Game Code Sections 3503 and 3513***

According to Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird (except English Sparrow [*Passer domesticus*] and European Starling [*Sturnus vulgaris*]). Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the MBTA, prohibiting the take or possession of any migratory non-game bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by the CDFW.

### ***Porter-Cologne Water Quality Control Act***

Waters of the State are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the State.” The State Water Board protects all waters in its regulatory scope but has special responsibility for isolated wetlands and headwaters. These water bodies have high resource value, are vulnerable to filling, and may not be regulated by other programs, such as Section 404 of the CWA. Waters of the State are regulated by the Water Boards under the State Water Quality Certification Program, which regulates discharges of dredged and fill material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a USACE permit, or fall under other Federal jurisdiction, and have the potential to impact Waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a Federal license or permit but does involve activities that may result in a discharge of harmful substances to Waters of the State, the Water Boards have the option to regulate such activities under its State authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

### **California Fish and Game Code Section 1600-1616**

Streams, lakes, and riparian vegetation, as habitat for fish and other wildlife species, are subject to jurisdiction by the CDFW under Sections 1600-1616 of the California Fish and Game Code. Any activity that will do one or more of the following:

- Substantially obstruct or divert the natural flow of a river, stream, or lake.
- Substantially change or use any material from the bed, channel, or bank of a river, stream, or lake.
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake generally requires a 1602 Lake and Streambed Alteration Agreement.

The term “stream”, which includes creeks and rivers, is defined in the California Code of Regulations (“CCR”) as follows:

*“a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72).*

In addition, the term “stream” can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). Riparian is defined as “on, or pertaining to, the banks of a stream”; therefore, riparian vegetation is defined as, “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself” (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from the CDFW.

### **CDFW Sensitive Vegetation Communities**

Sensitive vegetation communities are natural communities and habitats that are either unique in constituent components, of relatively limited distribution in the region, or of particularly high wildlife value. These communities may or may not necessarily contain special-status species. Sensitive natural communities are usually identified in local or regional plans, policies or regulations, or by the CDFW (i.e., CNDDDB) or the USFWS. The CNDDDB identifies a number of natural communities as “rare”, which are given the highest inventory priority (Holland 1986; CDFW 2010). Impacts to sensitive natural communities and habitats must be considered and evaluated under the CEQA.

### **Native Plant Protection Act**

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code, §§ 1900 through 1913) directed the CDFW to carry out the Legislature’s intent to “preserve, protect and enhance rare and endangered plants in this State.” The NPPA is administered by the CDFW, which has the authority to designate native plants as endangered or rare and to protect them from “take.”

### **California Native Plant Society**

Plant species which may not be listed as endangered, threatened, candidate, or proposed species under FESA or CESA, but are still considered rare, are generally assigned a rarity code by the California Native Plant Society (CNPS). The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. CNPS has compiled an inventory comprised of the information focusing on the geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California. Under CEQA, impacts analyses are mandatory for List 1 and 2 species, but not for all List 3 and 4 species as some do not meet the definitions of the Federal Native Plant Protection Act or the California Endangered Species Act; however, List 3 and 4 impacts to these species are generally considered in most CEQA analyses and are recommended by CNPS. The Inventory assigns plants to the following categories:

- Rank 1A: Presumed extinct in California;
- Rank 1B: Rare, threatened, or endangered in California and elsewhere;
- Rank 2: Rare, threatened, or endangered in California, but more common elsewhere;
- Rank 3: Plants for which more information is needed – A review list; and
- Rank 4: Plants of limited distribution – A watch list.

Additional endangerment codes are assigned to each taxon as follows:

- 1: Seriously endangered in California (over 80% of occurrences threatened/high degree of immediacy of threat).
- 2: Fairly endangered in California (20-80% occurrences threatened).
- 3: Not very endangered in California (<20% of occurrences threatened or no current threats known).

Plants that are Rank 1A, 1B, and 2 of the CNPS Inventory consist of plants that may qualify for formal listing, and the CDFW, as well as other State agencies (e.g., California Department of Forestry and Fire Protection). As part of the CEQA process, such species should be fully considered, as they meet the definition of threatened or endangered under the NPPA and Sections 2062 and 2067 of the California Fish and Game Code. California Rare Plant Rank 3 and 4 species are considered to be plants about which more information is needed or are uncommon enough that their status should be regularly monitored. Such plants may be eligible or may become eligible for State listing, and CNPS and CDFW recommend that these species be evaluated for consideration during the preparation of CEQA documents (CNPS 2017).

### ***CDFW California Natural Diversity Database***

CDFW maintains the California Natural Diversity Database (CNDDDB), which is a program that inventories the status and locations of rare plants and animals in California. Each rare species or plant community is assigned an “element ranking” in the CNDDDB, which quantifies and qualifies the rarity of each species/community within its global and State range. The CNDDDB gives five categories of rarity for each species’ global and State range; these are summarized in the General Biological Assessment Report prepared by MIG in Appendix D (MIG 2018). All Federal and State listed species are assigned a ranking; however, even non-listed species (such as Species of Concern, Special Animals, or plants on the CNPS list) are assigned an element ranking by CDFW for the CNDDDB. Impacts to species which are assigned an element ranking in the CNDDDB are considered under CEQA.

### **Local**

#### ***City of Monrovia General Plan***

According to the City of Monrovia General Plan, “little vacant land suitable for development is available. Therefore, future development, like current development patterns, will involve either the intensification of already existing uses or recycling to similar uses.” The over 4.5-mile trail system and surrounding Hillside Wilderness Preserve, discussed at length in the Hillside Wilderness Preserve Resource Management Plan (adopted in 2012), will remain protected and intact. Other areas within City boundaries have been designated or envisioned for future development/improvement, are generally urbanized, and have very little value for biological resources.

#### ***City of Monrovia Oak Tree Preservation Ordinance***

The City of Monrovia Oak Tree Preservation Ordinance (87-11) adopted in 1987 to preserve Monrovia’s native oak trees, contains regulations in §17.20.40 of the Monrovia Municipal Code. Oak trees protected include any trees of the genus *Quercus* within the city limits of Monrovia with trunks ten inches in diameter or more, measured at two feet above level ground. Oaks are protected within single-family, multiple-family, commercial, or industrial zones, in addition to vacant lots and/or oak trees indicated in an oak tree preservation plan. Oaks must also be protected from grading, oil/gas/other construction chemicals, or signage or other obstructions during construction via an oak tree protection plan approved by the City’s Development Review Committee, which includes guidelines for placing fencing around protected oaks. Activities that will cut an oak to the ground, extract an oak, kill/remove an oak by other means, prune an oak so that more than one-third of the crown/existing foliage/root system is removed, or will disturb underground beneath the dripline of an oak require permitting through the City of Monrovia.

## **8.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts to sensitive biological resources that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **8.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items IV (a) through (f), implementation of the Project would have a significant impact on biological resources if it would:

- (a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- (c) Have a substantial adverse effect on State or Federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- (e) Conflict with any local policies or Ordinances protecting biological resources, such as a tree preservation policy or Ordinance; or
- (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.

### **8.2.2 Environmental Impacts**

Implementation of the Project would involve alteration of an already-developed area that does not support a wide diversity of biological resources. Though the majority of the Project area currently encompasses residential, commercial, industrial, and other urban development, sensitive habitat along an unnamed drainage channel and coast live oak trees still exist that could support plant and wildlife species. Potential impacts to these resources, and where necessary, associated mitigation measures to offset these impacts, are discussed below.

#### **IMPACT BIO-1 NESTING BIRDS**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Native and ornamental vegetation in the Project area have the potential to provide nesting habitat for bird species protected by the MBTA and California Fish and Game Code Sections 3503 and 3513. There is potential for ground- and tree-nesting birds to establish nests in the Project area prior to construction activities. Intentional destruction of or disturbance to an active nest is prohibited under state and federal law. Construction activities including site mobilization, tree removal, other vegetation clearing, grubbing, grading, and noise and vibration from the operation of heavy equipment have the potential to result in significant direct (i.e., death or physical harm) and/or indirect (i.e., nest abandonment) impacts to nesting birds. Implementation



of mitigation measure MM BIO-1 would be required to reduce impacts to nesting birds to a less than significant level.

## Mitigation Measures

Mitigation Measure MM BIO-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM BIO-1: Nesting Bird Protection.** If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist (as determined by a combination of academic training and professional experience in biological sciences and related resource management activities) no more than five (5) days prior to the beginning of excavation, grading and/or vegetation removal. Surveys shall be conducted in proposed work areas, staging and storage areas, along equipment transportation routes, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys shall be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus *Buteo*, the survey area shall encompass a 500-foot radius. Surveys shall be conducted during weather conditions suited to maximize the observation of possible nests and shall concentrate on areas of suitable habitat. If a lapse in project-related work of five (5) days or longer occurs, an additional nest survey shall be required before work can be reinitiated.

If active nests are found during any preconstruction survey, a qualified biologist shall establish an appropriate buffer between the nest and active construction. The qualified biologist shall clearly mark the established buffer. The applicant shall maintain the buffer until young have fledged and are foraging independently. The qualified biologist shall document pre-construction baseline monitoring of the nest to characterize “normal” bird behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and shall increase the buffer if birds are showing signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and flying away from the nest). If this is not possible, work shall cease in the area until young have fledged and the nest is no longer active (e.g. young have fledged, predation, or other non-anthropogenic nest failure). **Requirements and Timing:** Measure shall be printed on all construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.

## IMPACT BIO-2 POTENTIAL ADVERSE EFFECTS ON JURISDICTIONAL WATERS

### Alexan Foothills Specific Plan

A significant impact would occur if a project has a substantial adverse effect on jurisdictional waters. The USACE and EPA regulate the discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act. Section 404 of the CWA requires a permit before dredged or fill material may be discharged into waters of the United States. Section 401 of the CWA requires that an applicant for a federal permit obtain a certification from the RWQCB as well. Additionally, Section 1602 of the California Fish and Game Code requires the issuance of a Lake and Streambed Alteration Agreement (LSAA) to authorize work in jurisdictional streambeds.

The concrete-lined drainage channel represents jurisdictional waters of the State and United States and is subject to the USACE, RWQCB, and CDFW jurisdiction. Implementation of the Alexan Foothills Specific Plan would require installation of an outflow pipe to properly divert overflow stormwater from the development to the channel (Helix 2019). To install the pipe, an approximately two-foot diameter hole would be bored into the concrete wall to install the outflow pipe (Helix 2019). Since the invert of the channel would not be impacted, installation of the outflow pipe would only temporarily impact a small area of CDFW jurisdiction totaling approximately 1.5 square feet (Helix 2019). The outflow pipe would not impact jurisdictional waters of the United States subject to the USACE and RWQCB jurisdiction (Helix 2019).

No direct impacts to oak trees associated with the drainage channel within the Alexan Foothills Specific Plan area would occur as a result of construction of the Alexan Foothills Specific Plan, including installation of the outflow pipe to the channel.

However, modification of the bank of the jurisdictional drainage channel, and discharge of stormwater to it, would be considered a potentially significant impact on the drainage and could be subject to approval by the CDFW, RWQCB, and likely the USACE. Impacts would be mitigated to a less than significant level by implementing mitigation measures BIO-2a through BIO-2d.

### **ZCA Area A**

Future development within ZCA Area A could propose disturbance to the drainage channel. As such, the potentially significant impacts within the ZCA Area A would be similar to those described above for the Alexan Foothills Specific Plan and would require the implementation of mitigation measures BIO-2a through BIO-2d to mitigate impacts to a less than significant level.

### **ZCA Area C**

Future development within ZCA Area C would not affect the drainage in the Project area. No mitigation measures are required in this area to protect jurisdictional waters.

### **Mitigation Measures**

Mitigation Measures MM BIO-2a through BIO-2d are applicable to the Alexan Foothills Specific Plan and future development projects within ZCA Area A.

**MM BIO-2a: Avoidance and Minimization Measures for Channel.** Applicant shall implement the following standard construction and post-construction measures to minimize impacts to the drainage channel in the Project area:

- Use standard Best Management Practices (BMPs) to minimize impacts during construction.
- Construction-related equipment shall be stored in upland areas, outside of the channel except as required by project design (restoration, trash removal, etc.).
- Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Source control BMPs may include landscape planning, roof runoff controls, trash storage areas, use of alternative building materials, and education of future tenants and residents. Treatment control BMPs may include detention basins, vegetated swales (bio-swales), drain inlets,

and vegetated buffers. Water quality BMPs shall be implemented throughout the project site to capture and treat contaminants.

- To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Employees shall strictly limit their activities, vehicles, equipment, and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Construction limits shall be fenced with orange snow screen and exclusion fencing should be maintained until the completion of construction activities.

**Requirements and Timing:** This measure shall be printed on all drawings. **Monitoring:** City staff shall confirm that measures are printed on all drawings and adhered to during construction.

**MM BIO-2b: Obtain USACE 404 Permit.** If any alterations of, or discharges into, waters of the United States, including Section 404 wetlands are proposed, these alterations must be in conformance with the Sections 404 and 401 of the CWA via certification and permitting prior to any grading or construction that may impact jurisdictional area(s), as applicable. Activities that usually involve a regulated discharge of dredged or fill materials include (but are not limited to) grading, placing of riprap for erosion control, pouring concrete, laying sod, preparing soil for planting (e.g., turning soil over, adding soil amendments), stockpiling excavated material, mechanized removal of vegetation, and driving of piles for certain types of structures. If avoidance of federally protected wetlands is not feasible, securing 404 and 401 permits under the Clean Water Act and compliance with the federal and state “no net loss of wetlands” policy will be required in accordance with USACE and RWQCB regulations. The terms and conditions of these permits are anticipated to require mitigation consistent with *Compensatory Mitigation for Losses of Aquatic Resources; Final Rule* (USACE, United States Environmental Protection Agency [EPA], *Federal Register*, April 10, 2008).

Prior to initiation of ground disturbance activities within waters of the U.S., the applicant shall submit a jurisdictional delineation of waters of the U.S. to the USACE to request a formal verification of the limits of their jurisdiction and to identify potential impacts to waters of the U.S. If the USACE determines that jurisdictional waters of the U.S. will be impacted, the appropriate CWA Section 404 permit shall be acquired by the applicant for the construction of the development. In addition, the applicant shall be required to submit a Section 401 Water Quality Certification application to the Los Angeles RWQCB. If the USACE does not assert regulatory jurisdiction, then the applicant may be required to submit a Notice of Intent to the RWQCB for their General Permit R6T-2003-0004 for minor impact projects. If required, all regulatory permits will be obtained, and all conditions will be agreed upon to prior to project implementation. The applicant shall be responsible for complying with all conditions outlined in the applicable USACE, and/or RWQCB permit. Impact minimization measures associated with permit conditions of approval may include implementation of best management practices (i.e., erosion and sediment control measures) and seasonal work restrictions, as appropriate. Impacts to jurisdictional features shall not occur until the permits are received from the appropriate regulatory agencies, or correspondence is received from the agencies indicating that a permit is not required. **Requirements and Timing:** This measure shall be printed on all drawings. A Section 404 permit and Section 401 Water Quality Certification or Waiver shall be obtained prior to issuance of demolition or building permits for any portion of the development resulting in the discharge of dredged or fill material into the drainage. **Monitoring:** For developments resulting in the discharge of dredged or fill materials into the drainage in the Project area, City staff shall confirm that any required Section 404 permit and Section 401 Water Quality Certification or

Waiver is obtained prior to issuance of demolition or building permits for the portion of the development impacting the jurisdictional drainage.

**MM BIO-2c: Consult CDFW on Section 1602 Requirements.** If waters of the State subject to CDFW's jurisdiction cannot be feasibly avoided, the applicant shall submit to CDFW a Section 1602 Notification regarding the potential need for a Lake and Streambed Alteration Agreement (LSAA) to authorize work in CDFW jurisdictional areas. If an LSAA is required, the applicant shall be responsible for complying with all conditions outlined in the LSAA, which may include wildlife habitat and streambed impact avoidance, minimization, and mitigation measures consistent with CDFW requirements for LSAs. Impacts to development in Project areas subject to CDFW's jurisdiction shall not occur unless an LSAA is received from CDFW, correspondence is received indicating that an LSAA is not required, or the work is authorized by "operation of law" pursuant to the Fish and Game Code. **Requirements and Timing:** This measure shall be printed on all drawings. Prior to issuance of demolition or building permits for any portion of the development impacting areas subject to CDFW's jurisdiction, either the applicant receives from CDFW an LSAA or correspondence that an LSAA is not required, or the work is authorized by "operation of law" pursuant to the Fish and Game Code. **Monitoring:** For developments disturbing areas subject to CDFW's jurisdiction, City staff shall confirm that an LSAA has been obtained, if required, prior to issuance of demolition or building permits for those portions of the development subject to CDFW's jurisdiction.

**MM BIO-2d: Habitat Mitigation Plan.** Preparation of a habitat mitigation plan may be required by the CDFW as part of an LSAA process or by the USACE and the RWQCB for permitting of discharges to waters of the United States, if required. The mitigation plan would address protection measures for the jurisdictional drainage and any protected trees retained onsite, quantify the total acreage of impacts to each sensitive resource, describe creation/replacement ratio for acres impacted (typically at least 1:1), identify potential mitigation sites, provide a planting plan, and outline monitoring and maintenance requirements. The amount of compensatory acreage shall be based on the functions and values of the impacted drainage and riparian habitat. If required, the plan would be prepared by a qualified biologist pursuant to, and through consultation with, CDFW. As an alternative, equivalent mitigation credits may be purchased at a mitigation bank to offset impacts to jurisdictional resources. The mitigation plan would provide detailed information about the bank and how the purchase of credits will result in no net loss of these protected resources. Purchase of mitigation credits would be subject to approval and verification by CDFW. **Requirements and Timing:** Measure shall be printed on all drawings. If required by the permitting resource agencies (i.e., USACE, RWQCB, or CDFW), a Habitat Mitigation Plan shall be prepared and approved by the City and other responsible natural resource agencies prior to issuance of demolition or building permits for the portion of the development impacting the drainage. **Monitoring:** City staff and the City Engineer shall review and approve of the Habitat Mitigation Plan, if one is required by resource agencies, prior to issuance of demolition or building permits for the portion of the development impacting the drainage.

## **IMPACT BIO-3 IMPACT ON SENSITIVE NATURAL VEGETATION COMMUNITIES**

### **GPA, ZCA Areas A and C, and Alexan Foothill Specific Plan**

No sensitive natural vegetation communities documented in CNDDDB (CDFW 2018) are present in the Project area (see Appendix D). However, the stand of coast live oak trees along the concrete-lined drainage channel may be regulated as riparian habitat by CDFW. As stated under Impact BIO-2 above, buildout of the proposed Alexan Foothills Specific Plan would avoid

impacts on oak trees; however, future development within ZCA Areas A and C could propose disturbance to this drainage. Removal of riparian habitat would be considered a potentially significant impact. This impact would be mitigated to a level of less than significant with implementation of mitigation measures BIO-2a through BIO-2d.

### **Mitigation Measures**

Refer to mitigation measures BIO-2a through BIO-2d.

## **IMPACT BIO-4 IMPACT ON WILDLIFE CORRIDORS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project area represents a developed and urbanized area and is not located within an established wildlife movement corridor, movement pathway, or linkage between larger habitat areas for terrestrial or aquatic wildlife. Due to the disturbed, limited, and fragmented condition of habitats on-site, which would preclude most species from using the site for breeding/nesting, the Project area also does not function as a wildlife nursery site that would contribute disproportionately to a population. Thus, wildlife species, migratory corridors and native wildlife nursery sites would not be impacted due to implementation of the Project.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT BIO-5 IMPACT ON OTHER SPECIAL-STATUS SPECIES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

No other special status plant or wildlife species are expected to occur within the Project area due to a lack of suitable habitat (see Appendix D) and due to the high degree of site disturbance from existing development within and surrounding the Project area. Therefore, impacts on other special-status plant and wildlife species would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT BIO-6 CONFLICT WITH LOCAL POLICIES OR ORDINANCES OR CONSERVATION PLANS**

### **Alexan Foothills Specific Plan**

The Project area contains protected coast live oak trees (>10" in diameter at least 2 feet above the ground), including three along the Specific Plan area's western border. Disturbance to these oak trees would be avoided within the proposed Alexan Foothills Specific Plan area. Specifically, grading plans require protection of these trees. Thus, less than significant impacts would occur.

### **ZCA Areas A and C**

Future development resulting in the alteration to any/all oaks within the proposed ZCA Areas A and C would be required to comply with the City of Monrovia's Oak Tree Preservation Ordinance (Section 8.1.2), which may require a permit through the City's Development Review Committee. The City's permit procedures require consideration of the condition of the following criteria:

1. The condition of the tree with respect to disease, danger of falling, proximity to existing or proposed structures, and interference with utility service;
2. The necessity to remove the tree for compelling economic necessity to construct proposed structural improvements, or for the purpose of re-landscaping with plant material more suitable to the immediate environment;
3. Good forestry practice, such as in the thinning of growth where necessary or desirable to promote the healthy growth of the tree;
4. The topography of the land and the effect of tree removal on erosion, soil retention or surface water flow shall be taken into account and balanced with all other considerations affecting decision upon the permit; and
5. The number of oak trees or other trees existing in the neighborhood on improved property.

The Development Review Committee shall be guided by the standards established in the neighborhood and the effect of tree removal upon property values in the area. Accordingly, due to the City's Oak Tree Preservation Ordinance requirements and Standard Condition BIO-1, impacts on protected oak trees would be less than significant within ZCA Areas A and C.

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project area is not located within an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

### **Standard Conditions**

Standard Condition SC BIO-1 is applicable to future developments within ZCA Areas A and C.

**SC BIO-1:** Compliance with the City of Monrovia Oak Tree Preservation Ordinance (87-11), Municipal Code Section 17.20.40 is required for disturbance to protected coast live oak trees that are greater than or equal to 10" in diameter at least 2 feet above the ground. **Requirements and Timing:** This measure shall be printed on all construction drawings. Any planned removal or encroachment upon oak trees shall be shown on proposed demolition plans, site plans and grading plans, including the number and size of each oak tree, as well as the limits of the dripline of each oak tree. **Monitoring:** City staff shall review and approve the demolition plans, site plans and grading plans prior to issuance of any demolition, grading and building permits to confirm that the Oak Tree Preservation Ordinance is adhered to.

### **Mitigation Measures**



No mitigation measures are required.

### **8.2.3 Impact Conclusions**

The Project area is almost entirely hardscaped and provides very little biological resource value, other than the presence of the mature oak trees. However, the limited amount of native and non-native vegetation as well as the concrete-lined channel in the Project area may provide marginal habitat to some species. Any disturbance of the jurisdictional drainage and to the oak trees would result in a significant impact. However, with implementation of standard condition SC BIO-1 and mitigation measures MM BIO-1 and MM BIO-2a through MM BIO-2d, impacts would be reduced to less than significant levels.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AMSL	Above mean sea level
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CWA	Clean Water Act
DBH	Diameter at Breast Height
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FESA	Federal Endangered Species Act
GP	General Plan
GPA	General Plan Amendment
HCP	Habitat Conservation Plan
LSAA	Lake and Streambed Alteration Agreement
MBTA	Federal Migratory Bird Treaty Act
NCCP	Natural Community Conservation Planning
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollution Discharge Elimination System
NPPA	California Native Plant Protection Act
PD	Planned Development
RWQCB	Regional Water Quality Control Board
U.S.C.	United States Code
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
ZCA	Zoning Code Amendment
§	section

## References Cited

### California Department of Fish and Game (CDFG)

1994 A Field Guide to Lake and Streambed Alteration Agreements, California Fish and Game Code. Environmental Division (ESD).

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## **9. CULTURAL AND TRIBAL CULTURAL RESOURCES**

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This Chapter describes the cultural resources (archaeological resources and historical structures) and Tribal Cultural Resources in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

This analysis is based in part on the Cultural Resources Assessment Report prepared for the Project under separate cover, and incorporated herein by reference, as well as a Historic Report included in Appendix C of this Draft EIR.

### **9.1 SETTING**

#### **9.1.1 Environmental Setting**

##### **Project Area Setting**

The Project area consists of a 9.63-acre area located within an urbanized area of the City of Monrovia (City or Monrovia). It is bound by light industrial complexes/warehousing facilities, commercial buildings, single-family residences, multi-family apartment units, and METRO's Gold Line light rail tracks. The elevation within the Project area is approximately 440 feet above mean sea level. The topography is characterized as flat with a gentle slope towards the southeast. Historical aerial photographs (1948-2012) show the Project area to be highly disturbed, with ongoing and continuous industrial, commercial, and residential activities occurring from at least 1966 to the present. The Alexan Foothills Specific Plan area, comprising 6.77 acres of the Project area, supports two light industrial structures, one residential unit, one religious building, one commercial office building, and one asphalt covered storage lot. All structures were constructed between 1942 and 1987. The entire Project area was considered the "Study Area," for the impact analysis on cultural resources.

##### **Cultural and Tribal Cultural Setting**

Below are excerpts from the City of Monrovia's Historic Context Statement (ASM Affiliates 2018) providing a brief description of the cultural setting of Monrovia:

*"The native people of the area now known as Monrovia were the Tongva, or Gabrieleño Indians. Before Spanish colonization of Central America and Alta California, the San Gabriel Valley was occupied by indigenous people of Native American Shoshonean Tribes as early as 500 B.C., although archaeological investigations have documented human habitation of southern California as early as 12,000 years B.C.E. (before the common era). Later, this tribe became known as the Gabrielinos, after the Mission San Gabriel Arcángel. The indigenous tribes living at the foot of the San Gabriel Mountains were said to be the "wealthiest, most populous and most powerful ethnic nationality in aboriginal southern California" (Bean and Smith 1978, 538). The tribes were sustained by the rich land they occupied in and near the arroyos in the steep mountains to the north, which seasonally carried water down into the valley, joining the San Gabriel River and eventually reaching the Pacific Ocean. Recorded history of California began in the sixteenth century with Spanish colonization of Central America and Alta California. In*

*1771, Spanish missionaries arrived in the area and established Mission San Gabriel Arcángel. After Mexico won independence from Spain in 1821, California territory fell under the jurisdiction of the Mexican government. This led to the secularization of the missions by the 1830s, which resulted in the transference of mission land to Mexican ranchos. The 9,000-acre Rancho Santa Anita, within which present-day Monrovia is located, was granted to Hugo Reid in 1841 (Jimenez 2008; Ostrye 1986). The same year, Mexican Governor Juan Alvarado granted the eastern half of the rancho to Andreas Duarte, which created Rancho Azusa de Duarte....*

*In the 1850s, the strong demand for beef in the rapidly growing mining areas and cities in northern California had led the owners of some large ranchos in agricultural southern California to overextend their cattle operations. A period of flood and extended drought in the early 1860s destroyed the livestock and left them unable to pay their taxes. Many of the large ranchos were divided and sold, and both Rancho Santa Anita and Rancho Azusa de Duarte were sold to a series of owners....” and*

*“The City’s initial residential development was largely within the smaller town lots of the original 120-acre townsite laid out by Monroe and his partners, as well as in the larger lots of subdivisions north of White Oak Avenue (now Foothill Boulevard) including the Monrovia Addition, Banana Addition, and the two Keefer Subdivisions (Baker 2017; Jimenez 2017, 7). A total of 168 homes were reported to have been constructed by the end of 1888, which ranged from the grand Queen Anne residences of Monroe, Jerome I. Case, and General William A. Pile in the northern section, to modest one to one-and-one-half story vernacular, Folk Victorian, Neoclassical, and early Craftsman homes near the town center...”*

The history of Monrovia is also marked by construction of a railroad from Monrovia to Los Angeles as well as the interurban Pacific Electric Railway Line to Los Angeles and other urban centers.

### **9.1.2 Regulatory Setting**

The following is a summary of the applicable Federal, State, and local regulatory framework related to the protection of cultural resources.

#### **Federal**

##### ***Federal Antiquities Act***

Cultural resources are indirectly protected under the provisions of the Federal Antiquities Act of 1906 (16 U.S.C §§ 431 et seq.) and subsequent related legislation, regulations, policies, and guidance documents.

##### ***Section 106 of the National Historic Preservation Act of 1966 (NHPA)***

The NHPA establishes the nation’s policy for historic preservation and sets in place a program for the preservation of historic properties by requiring Federal agencies to consider effects to significant cultural resources (i.e. historic properties) prior to undertakings. Section 106 of the NHPA states that Federal agencies with direct or indirect jurisdiction over Federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Section 106 of the HPBA also states that the Advisory Council on Historic

Preservation (ACHP) and State Historic Preservation Officer (SHPO) must be afforded an opportunity to comment on such undertakings, through a process outlined in the ACHP regulations at 36 Code of Federal Regulations (CFR) Part 800.

### ***National Register of Historic Places***

The NRHP was established by the NHPA of 1966 as “an authoritative guide to be used by Federal, State, and Local governments, private groups, and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The NRHP recognizes properties that are significant at the national, State, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, or association. A property is eligible for the NRHP if it is significant under one or more of the following criteria as defined by NRHP:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B: It is associated with the lives of persons who are significant in our past.
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

### ***Native American Graves Protection and Repatriation Act of 1990***

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from Federal and Tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any Federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

## **State**

### ***California Environmental Quality Act (CEQA)***

Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local

register of historic resources or identified as “significant” in a local survey conducted in accordance with State guidelines are also considered historic resources under CEQA, unless a preponderance of the facts demonstrates otherwise. According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude a Lead Agency, as defined by CEQA, from determining that the resource may be a historic resource as defined in California Public Resources Code (PRC) Section 5024.1.

CEQA applies to archaeological resources when: (1) the archaeological resource satisfies the definition of a historical resource, or (2) the archaeological resource satisfies the definition of a “unique archaeological resource.” A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

1. The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

### ***California Register of Historical Resources***

Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is:

*“an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate properties that are to be protected, to the extent prudent and feasible, from substantial adverse change.”*

Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHLs) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria: (modeled after NRHP criteria):

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.



- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. It is possible that a resource whose integrity does not satisfy NRHP criteria may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Resources that have achieved significance within the past 50 years also may be eligible for inclusion in the CRHR, provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.

### ***California Historical Landmarks***

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have Statewide historical significance by meeting at least one of the criteria listed below. The resource must also be approved for designation by the County Board of Supervisors or the City or Town Council in whose jurisdiction it is located, be recommended by the State Historical Resources Commission, or be officially designated by the Director of California State Parks. The specific standards in use now were first applied in the “designation” of CHL No. 770. CHLs No. 770 and above are automatically listed in the CRHR.

To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria per California Historical Landmarks Registration: Criteria for Designation (California Office of Historic Preservation 2019):

- The first, last, only, or most significant of its type in the State or within a large geographic region (Northern, Central, or Southern California)
- Associated with an individual or group having a profound influence on the history of California
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder

### ***California Points of Historical Interest***

California Points of Historical Interest are sites, buildings, features, or events that are of local (City or County) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest (Points) designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historic resource may be designated as both a Landmark and a Point. If a Point is later granted status as a Landmark, the Point designation will be retired. In practice, the Point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.

To be eligible for designation as a Point, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (City or County)
- Associated with an individual or group having a profound influence on the history of the local area
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder

***Native American Heritage Commission, Public Resources Code Sections 5097.9–5097.991***

Section 5097.91 of the Public Resources Code (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a County coroner. Section 5097.5 defines the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands as a misdemeanor.

***California Native American Graves Protection and Repatriation Act of 2001***

Codified in the California Health and Safety Code Sections 8010–8030, the California Native American Graves Protection Act (NAGPRA) is consistent with the Federal NAGPRA. Intended to “provide a seamless and consistent State policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect,” the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The Act also provides a process for non–Federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

***Senate Bill 18***

Senate Bill (SB) 18 (California Government Code, Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for Cities, Counties, and agencies. It does so by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any General Plan or Specific Plan proposed on or after March 1, 2005. SB18 requires public notice to be sent to tribes listed on the Native American Heritage Commission’s SB18 Tribal Consultation List within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local

government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan.

### ***Assembly Bill 52***

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change in the significance of a Tribal Cultural Resource, as defined, is a project that may have a significant effect on the environment. AB 52 requires a lead agency to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe: (1) requests in writing consultation to the lead agency, (2) to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a Negative Declaration, Mitigated Negative declaration, or Environmental Impact Report is required for a project pursuant to CEQA. AB 52 specifies examples of mitigation measures that may be considered to avoid or minimize impacts on Tribal Cultural Resources.

### ***California Health and Safety Code, Sections 7050 and 7052***

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease and the County Coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

### ***California Penal Code, Section 622.5***

Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

## **Regional**

### ***County of Los Angeles Historic Preservation Ordinance***

Los Angeles County's Historic Preservation Ordinance (Ordinance 22: 22.44.3000-.3040) adopted regulations to preserve, protect, and enhance buildings, structures, and other resources and areas of historic interest and importance within the unincorporated territory of the County of Los Angeles, as authorized by Section 25373 of the California Government Code, for the educational, cultural, economic, and general welfare of the public.

## **Local**

### ***City of Monrovia General Plan***

Goal 9 of the Land Use Element of the City of Monrovia's General Plan is to preserve the character of existing neighborhoods and historic residences, with implementation of the following policies:

**Policy 9.1:** Continue to implement the historic preservation ordinance for designating, preserving, safeguarding historic structures, and creating historic districts in the City.

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

### ***Monrovia Zoning Code Section 17.10***

Monrovia Zoning Code Section 17.10 establishes the City's Discretionary Demolition Ordinance. The purpose of this Section is to preserve existing, potentially historic main residential buildings that are at least 50 years old to the greatest extent possible to protect against the loss of potential historic landmarks. Ordinance 2016-10 applies the demolition review process to not only total demolitions, but to any action that demolishes or materially alters a residential building.

### ***Monrovia Zoning Code Section 17.40***

Monrovia Zoning Code Section 17.40 establishes the City's Historic Preservation Ordinance. The intent of the Historic Preservation Ordinance is to protect the City's cultural heritage as embodied and reflected in the City's architectural history and patterns of development. The Historic Preservation Ordinance gives the Historic Preservation Commission the authority to review and designate local historical landmarks and historic districts. 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.

## **9.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to cultural resources and Tribal Cultural Resources that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for the GPA and ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **9.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items V (a) through (c) and XVII (a) and (b), implementation of the Project would have a significant impact related to cultural resources if it would:

- (a) Cause a substantial adverse change in the significance of a historic resource pursuant to CEQA Guidelines section 15064.5;
- (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;
- (c) Disturb any human remains, including those interred outside of formal cemeteries.

The Project would have a significant impact on Tribal Cultural Resources if it would cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public 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.

### **9.2.2 Analysis Methodology**

The methodology for evaluating potential environmental impacts on cultural resources and Tribal Cultural Resources followed this basic sequence:

- (1) The CEQA Statute and Guidelines, including Appendix G (Environmental Checklist Form), were consulted to identify environmental impact topics and issues that should be addressed in the EIR. In part, this process resulted in the significance criteria listed in subsection 9.2.1 above.
- (2) A records search was completed of the Project area at the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC). The records search included a review of all recorded archaeological and historical resources within a one-half mile radius of the Project area, as well as a review of cultural resource reports and historic topographic maps on file. In addition, MIG reviewed the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State Historic Resources Inventory (HRI) listings. The purpose of the records search was to determine whether previously recorded archaeological or historical resources exist within the Project area that require evaluation and treatment. A Sacred Lands File (SLF) records search was also completed through the NAHC.
- (3) A pedestrian survey was completed on March 8, 2018 to evaluate the Project area.
- (4) Field data and results of data record searches were evaluated to determine if there would be any potential impacts to cultural and Tribal Cultural Resources.
- (5) To identify Tribal Cultural Resources that could be impacted, a search of the Sacred Lands File was performed. As part of its AB 52 and SB 18 consultation efforts, the City sent letters to representatives of local Native American tribes in the area inviting them to consult on the Project.
- (6) For potential environmental impacts, mitigation measures were designed to avoid or reduce each impact to a less than significant level, where possible.

### **9.2.3 Environmental Impacts**

Results of the assessment are summarized below by key subject area as they relate to the impact questions: (1) historic structures; (2) archaeological resources; and (3) Tribal Cultural Resources.

#### **IMPACT CUL-1 HISTORIC STRUCTURES**

##### **GPA, ZCA Areas A and C, and Alexan Foothill Specific Plan**

##### **Previously Recorded Historical Resources Within Project Area Boundaries**

Results from the CHRIS-SCCIC search identified no previously recorded historical resources within the Project area boundaries; seven historic buildings and one historic bridge (P-19-179357, P-19-179365, P-19-187710, P-19-188780, P-19-188787, P-19-188788, P-19-188739, and P-19-189107) are located within a one-half mile radius of the Project area (see Table 9-1). None of the historic structures referenced in Table 9-1 would be affected by the Project.

**Table 9-1 Previously Recorded Cultural Resources Within One Half Mile of the Project Area**

<b>Resource No.</b>	<b>Resource Type</b>	<b>Description</b>	<b>NRHP Eligibility</b>	<b>CRHR Eligibility</b>	<b>Distance from the Project Area</b>
P-19-179357	Historic Building	The historic building is the Santa Fe Railroad Depot. The depot is composed of a two-story central section flanked by two cross gabled sections of one story each. The Spanish Colonial-styled exterior is of stucco with a red tile roof. The depot was built in 1925 and is currently vacant.	Eligible (3S) as an individual property through survey evaluation	Eligible (5S2) for local listing or designation	1/16 of a mile to the southeast
P-19-179365	Historic Building	The historic building is a two-story Queen Anne residence that was owned by Mr. Stewart Wilson and was built in 1887. The outstanding architectural features are the four prominent bays that protrude from the upper story; each is topped by a shingled gable with wide barge boards decorated with cut-out designs.	Not Eligible	Not Eligible: *Potential City Historic Landmark	7/8 of a mile to the northwest
P-19-187710	Historic Building	The historic building is a one-story industrial building constructed of concrete block and bricks that possesses	Not Eligible	Not Eligible	5/8 of a mile to the north



**Table 9-1 Previously Recorded Cultural Resources Within One Half Mile of the Project Area**

Resource No.	Resource Type	Description	NRHP Eligibility	CRHR Eligibility	Distance from the Project Area
		Streamline Modern Style characteristics. The building was constructed by W.H. McCune between 1944-1946.			
P-19-188780	Historic Building	The historic building was an elementary school; later used as a junior high school, high school, continuation school, and educational center. School consists of a relatively small campus with a "C" shaped main complex and ancillary building. Playground area to the east. The school was built in 1956.	Not Eligible	Not Eligible	7/8 of a mile to the northwest
P-19-188787	Historic Building	The historic building is a Modern-style industrial building, constructed on an irregular ground plan and lies on an elevated concrete slab foundation. The southeastern portion of the building is flat-roofed, while the western and southern portions are surmounted by low-pitched vaulted roofs. The building's construction was started in 1948 and was finished in 1949. The building was enlarged in 1950 and is currently vacant.	Not Eligible	Not Eligible	7/8 of a mile to the southeast
P-19-188788	Historic Building	The historic building is a one-story industrial building that exhibits an L-shaped ground plan and faces west. The front portion of the building, housing office spaces, is flat-roofed, and the rear portion is surmounted by a low-pitched vaulted roof, which is surrounded by low parapets and dotted with protruding skylights. The building was contracted in 1946 and was enlarged in 1952-1953.	Not Eligible	Not Eligible	3/4 of a mile to the east
P-19-188789	Historic Building	This historic building, a one-story industrial building, is an elongated but generally	Not Eligible	Not Eligible	3/4 of a mile to the southeast

**Table 9-1 Previously Recorded Cultural Resources Within One Half Mile of the Project Area**

Resource No.	Resource Type	Description	NRHP Eligibility	CRHR Eligibility	Distance from the Project Area
		rectangular brick structure resting on a concrete slab foundation. It is surmounted by a very low-pitched vaulted roof, which is covered with gray composition shingles and fronted by a brick parapet. The building was built in 1948 by the architectural firm John M. Cooper.			
P-19-189107	Historic Structure	The historic structure, "Alta Vista Wash Deck Beam Bridge," was used by the former Atchison, Topeka and Santa Fe railroad. The bridge was constructed in 1907 according to recent engineering reports; the bridge is not considered to be structurally sound for heavy loads.	Not Eligible	Not Eligible	3/4 of a mile to the northwest
KEY: *Potential Historic Landmark = City of Monrovia Historic Preservation <sup>1</sup>					

**Potential Historic Structures Within Project Area Boundaries**

Three structures located at 340 West Evergreen Avenue, 1607 South Magnolia Avenue, and 1625 South Magnolia Avenue would be directly impacted due to demolition within the Alexan Foothills Specific Plan area. Since these buildings are 45 years old or older (built between 1942 and 1954) and would be demolished under the Project, they required an evaluation as historic sites to determine if any structures were eligible for listing in the National Register for Historic Places (NRHP), the California Register for Historic Resources (CRHR), or Local Register.

Further, Discretionary Demolition Review and Evaluation through the City of Monrovia's Historic Preservation Commission was also required for the residential structure located at 340 West Evergreen Avenue and for the religious structure located at 1607 South Magnolia Avenue, which was originally constructed as a residence, as specified in the City of Monrovia's Municipal Code Chapter 17.10: Ordinance 2016-10-Demolition Review of Main Residential Buildings.

The one light industrial structure at 1631 South Magnolia Avenue (APN: 8507-006-042) and the two light industrial structures at 1625 South Magnolia Avenue (APN: 8507-006-041) are exempt

<sup>1</sup> City of Monrovia. Historic Preservation: Potential Historic Landmarks. Electronically available at: <http://www.cityofmonrovia.org/home/showdocument?id=1302>

from the Discretionary Demolition Review and Evaluation process as the Ordinance does not apply to industrial buildings.

Daly & Associates conducted a historic site evaluation and prepared a summary report on the existing structures at 340 West Evergreen and at 1607 South Magnolia Avenue. Their summary report was prepared to assess the existing structures eligibility for listing in the CRHR and to fulfill the requirements set forth in the City of Monrovia Municipal Code Chapter 17.10: Ordinance No. 2016-10-Demolition Review of Main Residential Buildings. Daly & Associates Summary Report, State of California Department of Parks and Recreation Series 523 Forms for the two historic residences, and qualifications of key personal are provided in Appendix C.

Mr. Chris Purtell, Registered Professional Archaeologist with MIG, Inc., evaluated the structure at 1625 South Magnolia Avenue to determine its eligibility for listing in the NRHP, the CRHR, or as a City Historic Landmark. Results of his evaluation are contained in a Cultural Resources Assessment Report (MIG 2018).

Details on each structure are provided in Figure 9-1: Historic Structures Photographs and in text below. They are also included in the Cultural Resources Assessment Report (under separate cover) and a Historic Report prepared in Appendix E2. On August 29, 2018, the Monrovia Historic Preservation Commission (HPC) assigned a rating code of 6Z for the properties at 1607 South Magnolia Avenue and 340 West Evergreen Avenue. A California Resources Historic Status code of 6Z means that the property is not eligible for listing or designation under federal, state, or local evaluation criteria.

### ***340 West Evergreen Avenue***

340 West Evergreen Avenue is a single-family residence built in 1949. The residence is a free-standing structure that has a symmetrical façade. The residence has a semi-circular driveway with two entrances both accessing Evergreen Avenue. Today, the house serves as both a residence and commercial space, with the office situated on the structure's west side in a converted garage. The house is a ranch-style, one-story stucco structure with a gable roof exhibiting a single brick chimney. It has a rectangular shape with the long edge facing West Evergreen Avenue and the short edge running a perpendicular axis to the north. The residence site exhibits little to no backyard, with a cinder block wall that separates it from an open-air storage lot to the south. The residence's main façade is characterized by the use of two materials: a stucco exterior and a composite roof. The stucco exterior extends around all four sides of the building. A series of windows are pane in vinyl and are not original to the house. The windows are located on all four sides of the structure. The overall condition of the house is good.

The house is not individually eligible for listing on the National Register under Criterion A or the California Register under Criterion 1 for association with events that have made a significant contribution to the broad patterns of local, state, or national history. Archival research failed to uncover any significant contribution to social, political, and economic trends that were occurring in Monrovia or in the region during the era such that it would be individually eligible for listing on the National Register or California Register.

It is also not individually eligible for listing on the National Register under Criterion B or the California Register under Criterion 2 for resources that are associated with the lives of persons

significant in history. Archival research failed to reveal any persons of historical importance that are associated with this building.

It is not individually eligible for listing on the National Register under Criterion C or the California Register under Criterion 3. The current design of the house follows a modified ranch style, with characteristics common to houses built during the mid-twentieth century. Modifications to the house's windows, garage, and roof line have masked its original appearance, and it does not retain sufficient integrity. The house's style and stucco construction are common design elements that were widely used throughout the region and this type of building does not embody distinctive characteristics of a particular type, period or method of construction.

It does not reach individual significance that would make it eligible for listing on the National Register or California Register. Criterion D/4 is typically related to archeological resources rather than built resources. When Criterion D/4 does relate to built resources, it is for cases when the building itself is the principal source of important construction-related information. Based on historic and archival research, this criterion is not applicable to 340 West Evergreen Avenue building.

## **Conclusion**

The residence at 340 West Evergreen Avenue retains most of its integrity. It remains in its original location, design, and setting. The original building materials are mostly intact and appear to have undergone moderate change, as its front façade has been modified since its construction in 1942. Therefore, there is little contribution of workmanship, feeling, or association of this building. Although it does maintain most of its integrity, it is not sufficient for eligibility.

The property at 340 West Evergreen Avenue was evaluated for significance by using the theme of "Residential Development 1941-1967," with the sub-theme of "Single-Family Residential Infill", as presented in the Final City of Monrovia Historic Context Statement (ASM, 2018). ASM concluded:

- The property was found not to be part of or potential contributor to any historic district in the City;
- The property was not found to be a significant historical resource when evaluated under the criteria for listing in the California Register of Historical Resources; and
- The property was not found to meet the criteria to be eligible for being considered a Designated Historical Resource in the City of Monrovia.

## ***1607 South Magnolia Avenue***

1607 South Magnolia Avenue building is identified as a religious center built in 1949. The building is free-standing structure with a symmetrical façade; it appears to be rectangular in plan. The structure exhibits a single entrance and driveway facing South Magnolia Avenue. The structure's driveway has an electronic wrought-iron gate that separates its backyard area from the street. The structures' back lot is an asphalt covered space with two non-descript modern office trailers exhibiting wire meshed windows, with single entrance. The trailers are located approximately 30 feet northwest of the structure. The structure is a Minimal Traditional one-story, wood siding panel style building, with a gable roof, front lawn, and manicured landscaping. It has a rectangular shape with the long edge facing South Magnolia Avenue and

the short edge running along a parallel axis to the north. The main façade is characterized by the use of two materials: a wood siding panel exterior and a composite roof. The exterior panel siding extends around all four sides of the building. A series of windows are pane in vinyl, not original to the house, and located on all four sides of the structure. The overall condition of the house is good.

The building is not individually eligible for listing on the National Register under Criterion A or the California Register under Criterion 1 for association with events that have made a significant contribution to the broad patterns of local, state, or national history. Archival research failed to uncover any significant contribution to social, political, and economic trends that were occurring in Monrovia or in the region during the era such that it would be individually eligible for listing on the National Register or California Register.

It is not individually eligible for listing on the National Register under Criterion B or the California Register under Criterion 2 for resources that are associated with the lives of persons significant in history. Archival research failed to reveal any persons of historical importance that are associated with this building.

It is also not individually eligible for listed on the National Register under Criterion C or the California Register under Criterion 3. The current design of the building follows a Minimal Traditional style, with characteristics common to houses/structures from the mid-twentieth century. Modifications to the building's exterior, windows, and roof line have masked its original appearance, and it does not retain sufficient integrity. The building's construction style: wood panel siding and gable roof are common design elements that were widely used throughout the region, and this type of building does not embody distinctive characteristics of a particular type, period, or method of construction.

It does not reach individual significance that would make it eligible for listing on the National Register or California Register. Criterion D/4 is typically related to archeological resources rather than built resources. When Criterion D/4 does relate to built resources, it is for cases when the building itself is the principal source of important construction-related information. Based on historic and archival research, this criterion is not applicable to 1607 South Magnolia Avenue building.

## **Conclusion**

The 1607 South Magnolia Avenue structure remains in its original location and setting; however, the structure has lost much of its integrity as the original building was constructed as a "Poultry House" and has undergone several modifications to its façade since its construction in 1942. Therefore, there is little contribution of workmanship, feeling, or association from this building; therefore, it is not eligible for listing on the National Register or California Register.

### ***1625 South Magnolia Avenue***

1625 South Magnolia Avenue is a light industrial building built in 1954. It sits on a rectangular site just north of the Metro Gold Line tracks, with its main entrance facing South Magnolia Avenue. Today, the building serves as a fabrication and distribution facility. The structure is a vernacular one-story precast concrete building. It has a rectangular shape, with the short edge facing South Magnolia Avenue and the long edge facing west. On the building's south side, facing the METRO Gold Line tracks, is a single street access with two corrugated swing-up

metal doors. The street access leads to an east/west driveway connecting existing, non-related commercial buildings located behind the primary structure. The building's rear (facing west) opens to a variety of commercial buildings and commercial enterprises, all with open-air asphalt covered parking and storage lots (cars and trucks). The main façade uses one main material: precast concrete blocks. The concrete block façade continues around all four sides of the building. A series of windows are pane in steel frames and affixed to the exterior. The windows occur on three sides of the building -- north, south, and east. The west side of the building has no windows or doors. The building has a flat roof that exhibits no distinct or visible architectural features. The building's frontal landscaping along South Magnolia Avenue appears to be unkempt and neglected. The overall condition of the building is fair.

The building is not individually eligible for listing on the National Register under Criterion A or the California Register under Criterion 1 for association with events that have made a significant contribution to the broad patterns of local, state, or national history. Archival research failed to uncover any significant contribution to social, political, and economic trends that were occurring in Monrovia or in the region during the era such that it would be individually eligible for listing on the National Register or California Register.

The building is not individually eligible for listing on the National Register under Criterion B or the California Register under Criterion 2 for resources that are associated with the lives of persons significant in history. Archival research failed to reveal any persons of historical importance that are associated with this building.

The building is not individually eligible for listed on the National Register under Criterion C or the California Register under Criterion 3. The building's design follows a utilitarian style, with characteristics common to industrial/commercial buildings in the middle to late twentieth century. Precast concrete block construction was widely used after World War II and this building does not embody distinctive characteristics of a particular type, period or method of construction.

It does not reach individual significance that would make it eligible for listing on the National Register or California Register. Criterion D/4 is typically related to archeological resources rather than built resources. When Criterion D/4 does relate to built resources, it is for cases when the building itself is the principal source of important construction-related information. Based on historic research, this criterion is not applicable to 1625 South Magnolia Avenue.

## **Conclusion**

The building at 1625 South Magnolia Avenue retains integrity. It remains in its original location, design, and setting. The original building material is intact and appears to have undergone little change, since its construction in 1954. However, there is little contribution of workmanship, feeling, or association of this building. Although it does maintain integrity, it is not sufficient for eligibility.

Therefore, these three structures lack individual distinction and significance and are not eligible for listing on the NRHP or in the CRHR under any of the significance criteria. Therefore, the Project would result in no adverse change in the significance of historical structures as defined in CEQA Guidelines Section 15064.5.





Photograph 1  
340 West Evergreen Avenue, South-looking View



Photograph 2  
1607 South Magnolia Avenue, West-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*





Photograph 3  
1625 South Magnolia Avenue, West-looking View



Photograph 4  
Project Overview, Along South Magnolia Avenue North-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*



Photograph 5  
Project Overview, Along West Evergreen Avenue, East-looking View



Photograph 6  
1607 South Magnolia Avenue, West-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*





Photograph 7  
Project Overview, Along Dale Drive, South-looking View



Photograph 8  
Project Overview, South Magnolia Avenue, South-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*





Photograph 9  
1621 South Magnolia Avenue, West-looking View



Photograph 10  
1625 South Magnolia Avenue, West-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*



Photograph 11  
Project Overview, East-looking View

**Figure 9-1** Historic Structures Photographs

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

## Mitigation Measures

No mitigation measures are required.

## IMPACT CUL-2 ARCHAEOLOGICAL RESOURCES

### GPA, ZCA Areas A and C, and Alexan Foothill Specific Plan

Results from the CHRIS-SCCIC search indicate that no previously recorded archaeological resources have been identified within the Project area. The Project area is graded, heavily disturbed, and has been developed within an urban industrial setting for decades. However, despite the heavy disturbances of the Project area that may have displaced archaeological resources on the surface, it is possible that intact archaeological resources exist beneath the surface. As a result, Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3, and MM CUL-4 are required to reduce potentially significant impacts to previously undiscovered archaeological resources that may be accidentally encountered during Project implementation to a less than significant level. With implementation of these mitigation measures, the Project would not result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.

## Mitigation Measures

Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3, and MM CUL-4 are applicable to the Alexan Foothills Specific Plan and future development projects within ZCA Areas A and C.

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

**MM CUL-2. Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered.** If archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. Should the newly discovered artifacts be determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native



American construction monitoring shall be initiated. The applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. **Requirements and Timing:** This measure shall be printed on all construction drawings and grading plans. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.

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

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

## IMPACT CUL-3 HUMAN REMAINS

### GPA, ZCA Areas A and C, and Alexan Foothill Specific Plan

No known human remains have been identified from the CHRIS-SCCIC database within a one-mile radius of the Project area. No human remains were identified during the pedestrian survey of the Project area. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which could be encountered during construction excavations associated with the Project. In particular, given the proven prehistoric occupation of the region, the identification of the Santa Anita Wash and the San Gabriel River both located within a two-mile radius of the Project area, buried human remains could be unearthed during construction. As a result, Mitigation Measure MM CUL-5 is required to reduce impacts associated with finding previously unknown human remains during construction to a less than significant level. With implementation of this mitigation measure, the Project would not disturb any human remains, including those interred outside formal cemeteries.

### Mitigation Measures

Mitigation Measure CUL-5 applies to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

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

## IMPACT CUL-4 TRIBAL CULTURAL RESOURCES

### GPA, ZCA Areas A and C, and Alexan Foothill Specific Plan

The Project area is graded, heavily disturbed, and has been developed within an urban industrial setting for decades. The results of the records research compiled from the CHRIS-SCCIC search and the Sacred Lands File search (commissioned through the NAHC) failed to

indicate known Tribal Cultural Resources within the Project area boundaries or within a one-half mile radius of the Project area as specified in Public Resources Code (PRC): Sections 210741, 5020.1(k), or 5024.

The City of Monrovia mailed letters to a list of tribal representatives provided by the NAHC notifying them of the Project pursuant to AB 52 and SB 18. On January 11, 2018, the City of Monrovia met with Mr. Andrew Salas, Chairman of the Kizh Nation of the Gabrieleño Band of Mission Indians, on the Project under AB 52 and SB 18 in response to tribe’s request for consultation on October 26, 2018. At that time, Mr. Salas provided the City with a map of village sites and trade routes important to the Kizh Nation of the Gabrieleño Band of Mission Indians. None of these sites or routes are present in or near the Project area. On January 11, 2018, Mr. Salas also submitted a list of recommended measures to be taken to appropriately handle Tribal Cultural Resources and human remains including recommended monitoring by a Native American monitor during construction-related ground disturbing activities, and methods for treatment of Tribal Cultural Resources if inadvertently discovered.

Although no impacts to Tribal Cultural Resources are anticipated, mitigation measures MM CUL-1 to MM CUL-5 would address any previously undiscovered archaeological resources relating to Tribal Cultural Resources encountered during Project implementation. Therefore, the Project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource.

### Mitigation Measures

Refer to mitigation measures MM CUL-1 through MM CUL-5.

### 9.2.4 Impact Conclusions

Project impacts on historic resources, cultural resources, and Tribal Cultural Resources would be less than significant with mitigation incorporated.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
APN	Assessor’s Parcel Number
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHLs	California Historical Landmarks
CHRIS-SCCIC	South Central Coastal Information Center
CPHI	California Points of Historical Interest
CRHR	California Register of Historical Resources
EIR	Environmental Impact Report
GP/ZCA	General Plan / Zoning Code Amendment
HPC	Monrovia Historic Preservation Commission
HRI	Historical Resources Inventory
METRO	Los Angeles County Metropolitan Transportation Authority
MLD	Most Likely Descendent
NAGPRA	Native American Graves Protection and Repatriation Act

NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NOP	Notice of Preparation
NRHP	National Register of Historic Places
PRC	California Public Resources Code
SHPO	State Historic Preservation Officer
SB	Senate Bill
SLF	Sacred Lands File
U.S.C.	United States Code
§	section

### References Cited

#### ASM Affiliates

2018 City of Monrovia Historic Context Statement. Prepared for the City of Monrovia Planning Division. March.

#### California Office of Historic Preservation

2019 California Historical Landmarks Registration. Accessed February 2019. Available at [http://www.ohp.parks.ca.gov/?page\\_id=21747](http://www.ohp.parks.ca.gov/?page_id=21747).

#### Daly & Associates

2018 Historic Letter Report for the Alexan Monrovia Project. July 31.

#### MIG

2018 Cultural Resources Assessment for the Trammell Crow Monrovia Project, City of Monrovia, County of Los Angeles, CA. Prepared by Christopher W. Purtell, M. A., RPA, Director of Cultural Resources, MIG. April 30, 2018, Updated September 17, 2018.

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## **10. GEOLOGY AND SOILS**

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This EIR Chapter describes the existing geology and soils conditions in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

This analysis is based in part on Geocon West, Inc.'s (Geocon West) 2017 Geotechnical Report prepared for the Alexan Foothills Specific Plan contained in Appendix F, as well as the Monrovia General Plan's Safety Element (City of Monrovia 2002). Pursuant to Section 15150 of the CEQA Guidelines, these documents are herein incorporated by reference into this EIR and are available upon request.

### **10.1 SETTING**

The environmental and regulatory setting with respect to geology and soils is based on local, State and Federal regulations along with information from the City of Monrovia General Plan.

#### **10.1.1 Environmental Setting**

The Geotechnical Investigation by Geocon West (2017) and the Monrovia General Plan Safety Element describe the existing conditions related to geology (including seismic hazards), soils, and minerals in the Project area. A summary of the geologic conditions in the Project area are provided below.

#### **Geologic Setting and Soil Conditions**

The Project area is located in the northeastern San Gabriel Valley, an alluvial-filled valley bounded by the Sierra Madre Fault Zone and San Gabriel Mountains on the north, the Puente Hills on the south, the Covina and Indian Hills on the east, and the Raymond Basin on the west. The alluvial deposits are derived from erosion of the San Gabriel Mountains to the north and subsequent deposition by the San Gabriel River and other local drainages. The alluvium is estimated to be approximately 200 feet thick at the base of the mountains, extending to hundreds of feet thick in the central portion of the valley. Regionally, the site is located within the northern portion of the Peninsular Ranges geomorphic province. This geomorphic province is characterized by northwest-trending physiographic and geologic features.

The Alexan Foothills Specific Plan area is underlain by a shallow layer of artificial fill (approximately 2-1/2 feet). Below that are Holocene-age young alluvial fan deposits consisting of varying amounts of sand, silt, clay, and gravel.

#### **Groundwater**

Historically, the highest groundwater level in the area is approximately 145 feet beneath the ground surface. Based on current groundwater basin management practices, it is unlikely that groundwater levels will ever exceed the historic high levels.



## **Geologic Hazards**

### ***Seismicity, Surface Faults, and Ground Shaking***

The Project area is located in the seismically active Southern California region, but it is not within a currently established State of California Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. However, the site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The closest active fault to the site is the Raymond Fault, located approximately 1.4 miles to the northwest (California Division of Mines and Geology [CDMG] 2007). Other nearby active faults are the Duarte Fault, the Sierra Madre Fault, the Verdugo Fault, the Whittier Fault, the Hollywood Fault, and the Cucamonga Fault, located approximately 1.6 miles northeast, 2.1 miles north-northeast, 7.1 miles west, 7.2 miles southwest, 13.5 miles west, and 19 miles east of the Project area, respectively. The active San Andreas Fault Zone is located approximately 23 miles north-northeast of the site. The closest potentially active faults to the site are the San Jose Fault and the Indian Hill Fault located approximately 7.4 miles to the southeast and 7.5 miles to the southeast, respectively. The potentially active San Gabriel Fault is located approximately 7.7 miles north of the Project area (Ziony and Jones 1989).

### ***Liquefaction***

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. Given the aforementioned historical depth to groundwater, the potential for liquefaction and associated ground deformations beneath the Project area is very low. The Project area is not located within a required zone of required investigation for liquefaction, according to the Seismic Hazards Zone Map for the Mount Wilson 7.5 Minute Quadrangle (CGS 2017; CDMG 1999). The County of Los Angeles Safety Element (Leighton 1990) also indicates that the site is not located in a liquefiable area.

### ***Slope Stability/Landslides***

The Project area is relatively level and the topography in the vicinity slopes downward toward the south and southwest. The State of California Seismic Hazard Zone Map for the Mount Wilson Quadrangle indicates that the site is not located within a zone of required investigation for earthquake-induced landslides (CGS, 2017; CDMG, 1999). There are no known landslides near the site, nor is the site in the path of any known or potential landslides.

### ***Earthquake-Induced Flooding***

Earthquake-induced flooding is inundation caused by failure of dams or other water-retaining structures due to earthquakes. The City of Monrovia Safety Element (2002) indicates that the site is located within the potential inundation areas for the Santa Anita Dam and Sawpit Debris Dam. However, these reservoirs are continually monitored by various governmental agencies to guard against the threat of dam failure. Current design, construction practices, and ongoing programs

of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake (MCE) for the site. Therefore, the potential for inundation at the site as a result of an earthquake-induced dam failure is considered low.

### ***Tsunamis, Seiche, and Flooding***

The site is not located within a coastal area. Therefore, tsunamis, seismic sea waves, are not considered a significant hazard at the site. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the Project area. Therefore, flooding from a seismically-induced seiche is considered unlikely.

### ***Subsidence***

Subsidence occurs when a large portion of the ground surface is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Information on the California Division of Oil, Gas and Geothermal Resources (DOGGR) Well Finder Website (DOGGR 2017) indicates the site is not located within the limits of an oilfield, and that no oil or gas wells are located within a mile of the site vicinity. Additionally, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site.

### **Paleontological Setting**

The Alexan Foothills Specific Plan area, and likely the ZCA Areas A and C as well, are comprised of surface sediments composed of younger Quaternary Alluvium, derived as alluvial fan deposits from the San Gabriel Mountains to the north. These sediments are likely underlain, possibly at relatively shallow depths, by older Quaternary deposits found at varying depths that may well contain significant vertebrate fossils (McLeod 2018). Excavations that extend down into older sedimentary deposits may well uncover significant vertebrate fossil remains and, therefore, should be closely monitored to quickly and professionally collect any vertebrate fossil remains without impeding development (McLeod 2018).

#### **10.1.2 Regulatory Setting**

A summary of the Federal, State, and local regulations relevant to geology and soils is found below.

#### **Federal**

##### ***Earthquake Hazard Reduction Act of 1977 (Amended 2004)***

The Earthquake Hazard Reduction Act primarily aims to reduce loss of life, injury, destruction of property, economic destruction, and social disruption via the implementation of earthquake hazard reduction measures. These measures include: improved design and construction methods and practices, land-use controls and redevelopment, prediction and early-warning systems, coordinated emergency preparedness plans, and public education/involvement programs. The Act led to the creation of the National Earthquake Hazards Reduction Program (NEHRP). Established by Congress in 1977, the NEHRP focuses on those hazard reduction measures

outlined in the Earthquake Hazard Reduction Act. The NEHRP is a collaborative effort among the Federal Emergency Management Agency (FEMA), the National Institute of Standards and Technology (NIST), the National Science Foundation (NSF), and the United States Geological Survey (USGS).

## **State**

### ***California Government Code Section 65302(g)***

This section of the California Government Code requires general plans to include a safety element that provides for the protection of the community from unreasonable risks associated with the effects of seismically-induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence; liquefaction; and other seismic hazards. The Safety Element must also include mapping of known geologic or seismic hazards.

### ***Alquist-Priolo Earthquake Fault Zoning Act***

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Sections 2621-2630) was passed in 1972 to mitigate the potential hazard of surface faults to structures for human occupancy. The main purpose of the Act is to prevent the construction of human-occupied buildings over-active faults. The Act only addresses the hazard of fault rupture and is not directed toward other earthquake hazards.

The Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue maps to all affected cities, counties, and State agencies for their use in planning and controlling development. Local agencies must regulate most development projects within the zones, and there generally can be no construction for human occupancy within 50 feet of an active fault zone.

### ***Seismic Hazards Mapping Act***

The Seismic Hazards Mapping Act (Public Resources Code Sections 2690-2699.6) was passed in 1990 to address earthquake hazards other than fault rupture, including liquefaction and seismically induced landslides. Seismic Hazard Zones are mapped by the State Geologist to assist local governments in land use planning. The purpose of the Act is to "reduce the threat to public safety and to minimize the loss of life and property by identifying and mitigating these seismic hazards."

### ***California Building Code***

The California Building Code (CBC), Title 24, serves as the basis for the design and construction of buildings in California. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of buildings and structures. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control.

## **Local**

### ***City of Monrovia General Plan: Safety Element***

The General Plan Safety Element identifies and evaluates natural hazards associated with seismic activity, landslides, flooding and fire within the City of Monrovia. The document provides the goals for each of the relevant City departments to provide responsible planning resulting in reduction of loss of life, injuries, damage to property and other losses associated with such disasters, and to act as a guide to prepare for possible natural or man-caused disasters.

The following policy of the Safety Element applies to the Project:

**Policy 1.3.2.** If through 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.

## **10.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to geology (including seismicity) and soils that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **10.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items VII (a) through (e), implementation of the Project would have a significant impact related to geology and soils if it would:

- (a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - (1) 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 (Division of Mines and Geology Special Publication 42);
  - (2) Strong seismic ground shaking;
  - (3) Seismic-related ground failure, including liquefaction; or
  - (4) Landslides;
- (b) Result in substantial soil erosion or the loss of topsoil;
- (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse;

- (d) Be located on expansive soil, as defined by Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property;
- (e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater;
- (f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## **10.2.2 Environmental Impacts**

### **IMPACT GEO-1 SEISMIC HAZARDS**

#### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

A Geotechnical Investigation was prepared for the Alexan Foothills Specific Plan area by Geocon West (2017) and is included in Appendix F. The report concludes that the Project area is not within an Alquist-Priolo Earthquake Fault Zone. The report also concludes that the potential for surface rupture in faulting occurring beneath the Alexan Foothills Specific Plan area during the design life of the proposed development is considered low and that the Specific Plan can be developed as proposed with some recommendations regarding site design and construction. While the Alexan Foothills Specific Plan area, as well as likely ZCA Areas A and C, are not at significant risk for fault rupture because they are outside of Alquist-Priolo Earthquake Fault Zones (Geocon West 2017), the nearby San Jose Fault has the potential of generating earthquakes of magnitudes ranging from 6.0 to 6.5 on the Richter Magnitude Scale in the Project area. Strong earthquakes can cause widespread property damage, injury, and loss of life. Secondary impacts include fires and disruption of utilities and service systems. Seismic hazard impacts would be adverse and significant without mitigation. Therefore, mitigation measure MM GEO-1 requires that a Geotechnical Investigation be prepared for all development in the Project area and require that all recommendations in the Geotechnical Report are implemented during construction. With implementation of this mitigation measure, impacts would be reduced to less than significant levels.

Finally, the Project area is not in a coastal zone nor is it near any water bodies. Therefore, there is no risk for tsunami or flooding from a seismically-induced seiche. The City of Monrovia Safety Element (2002) indicates that the site is located within the potential inundation areas for the Santa Anita Dam and Saw Pit Dam. However, these reservoirs are continually monitored by governmental agencies to guard against the threat of dam failure. All permitted dams are capable of withstanding the maximum considered earthquake (MCE) for the site. Therefore, the potential for inundation at the Project area as a result of an earthquake-induced dam failure is considered low and impacts would be less than significant.

#### **Mitigation Measures**

Mitigation Measure MM GEO-1 is applicable to the Alexan Foothills Specific Plan as well as future development within ZCA Areas A and C.

**MM GEO-1.** Prior to the issuance of grading and building permits for all proposed development, the applicant shall retain a California registered and licensed geotechnical engineer to prepare a

Geotechnical Report to provide construction and design recommendations for the proposed facilities to withstand probable seismically induced ground shaking. The Geotechnical Report shall provide specific recommendations for structural foundations and specifications and procedures for grading, including the suitability of onsite materials for use as fill. All grading, drainage, and building plans shall include all recommendations of the final Geotechnical Report for the development. **Requirements and Timing:** The Geotechnical Report shall be reviewed and approved by the City Department of Public Works prior to issuance of grading and permits. In addition, the geotechnical engineers for the development shall sign a title block on the grading, drainage, and building plans stating that the recommendations of the development's Geotechnical Report have been followed in the approved plans that he or she is signing. **Monitoring:** City Department of Public Works staff shall review and approve of the Geotechnical Report, and that grading, drainage, and building plans are signed by the geotechnical engineer, prior to issuance of grading and building permits.

## **IMPACT GEO-2 EROSION**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Per State and local stormwater regulations (see Chapter 13, Hydrology and Water Quality), the Alexan Foothills Specific Plan includes a drainage system designed to collect and control all site drainage in non-erosive drainage devices such that drainage not be allowed to pond anywhere on the site. Future development in ZCA Areas A and C would also be required to collect and control all site drainage as well. Therefore, the potential for erosion or loss of topsoil resulting from the Specific Plan or future development within ZCA Areas A and C is low; impacts would be less than significant.

#### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT GEO-3 LANDSLIDES, SUBSIDENCE, AND LIQUEFACTION**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project area is relatively flat and does not lie in the path of any known or potential landslides. Neither the Alexan Foothills Specific Plan area or ZCA Areas A and C are within a zone requiring investigation for liquefaction, and there appears to be little or no potential for ground subsidence; therefore, the risk of liquefaction or subsidence is considered low. Impacts would be less than significant.

#### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT GEO-4 EXPANSIVE SOILS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Soils within the Project area are considered to have "very low" expansive potential and are considered non-expansive, as defined by Table 18-1-B of the Uniform Building Code (Geocon



West 2017). Neither implementation of the Alexan Foothills Specific Plan, nor future development within ZCA Areas A and C, would create substantial risks to life or property involving expansive soils. Impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT GEO-5 SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Both the Alexan Foothills Specific Plan area and ZCA Areas A and C are served by existing sewer main lines. No septic tanks are proposed. No impact would occur.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT GEO-6 PALEONTOLOGICAL RESOURCES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

A paleontological resources records search was performed for the Project area through the Vertebrate Paleontological Department of the Natural History Museum of Los Angeles County in Los Angeles, California (NHMLAC). Results of the paleontological resources records search through the NHMLAC indicate no known vertebrate fossil localities from the NHMLAC database have been previously identified within the Project area or within a mile radius. Three fossil localities, LACM 1807 (Mastodon), LACM 2027 (Mammoth), and LACM CTI 342 (Turkey), are located within a 5 to 12-mile radius of the Project area that were discovered within the same sedimentary deposits at depths that extend into the Project area (McLeod 2018).

The results of the literature review and the search at the NHMLAC indicate that the Project area is comprised of surface sediments composed of younger Quaternary Alluvium, derived as alluvial fan deposits from the San Gabriel Mountains to the north. These sediments are likely underlain, possibly at relatively shallow depths, by older Quaternary deposits found at varying depths that could contain significant vertebrate fossils (McLeod 2018). Excavations that extend down into older sedimentary deposits could uncover significant vertebrate fossil remains and therefore should be closely monitored to quickly and professionally collect any vertebrate fossil remains without impeding development (McLeod 2018). Due to these findings, Mitigation Measures MM GEO-2 through MM GEO-5 are required to reduce potentially significant impacts to previously undiscovered paleontological resources and/or unique geological features that may be accidentally encountered during Project implementation to a less than significant level. With implementation of these mitigation measures, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### **Mitigation Measures**

Mitigation Measures MM GEO-2 through GEO-5 are applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM GEO-2. Conduct Paleontological Sensitivity Training for Construction Personnel.** The applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training shall include a handout and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary. **Requirements and Timing:** This measure shall be printed on all grading and construction drawings. The paleontologist shall obtain signatures from each worker receiving the training and shall submit the list to the City following completion of construction. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.

**MM GEO-3. Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities.** The applicant shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct periodic Paleontological Spot Checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks shall be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources shall be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if directed by the qualified professional paleontologist. **Requirements and Timing:** This measure shall be printed on all grading and construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.

**MM GEO-4. Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.** If paleontological resources and/or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. **Requirements and Timing:** This measure shall be printed on all grading and

construction drawings. **Monitoring:** City staff shall conduct periodic inspections in the field during construction to ensure measure is adhered to.

**MM GEO-5. Report Upon Completion of Monitoring Services.** Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of construction and required mitigation measures. **Requirements and Timing:** This measure shall be printed on all construction drawings. An archaeological monitoring report shall be prepared and submitted for City review and approval prior to final sign off on construction. **Monitoring:** City staff shall review and approve the archaeological monitoring report prior to final sign off on construction.

### **10.2.3 Impact Conclusions**

With the preparation and implementation of geotechnical reports in accordance with Monrovia General Plan Safety Element Policy 1.3.2 for new development associated with the Alexan Foothills Specific Plan or within ZCA Areas A and C, as well as implementation of mitigation measures MM GEO-1 through MM GEO-5, impacts on geology and soils would be less than significant.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
CBC	California Building Code
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CGS	California Geological Survey
DOGGR	Division of Oil, Gas, and Geothermal Resources
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GP	General Plan
MCE	Maximum considered earthquake
NEHRP	National Earthquake Hazards Reduction Program
NHMLAC	Vertebrate Paleontological Department of the Natural History Museum of Los Angeles County in Los Angeles, California (NHMLAC)
NIST	National Institute of Standards and Technology
NSF	National Science Foundation
USGS	United States Geological Survey
ZCA	Zoning Code Amendment

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# 11. GREENHOUSE GAS EMISSIONS AND ENERGY CONSUMPTION

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This EIR Chapter describes the existing emissions of greenhouse gases (GHGs) and energy consumption in the Project area, describes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce potentially significant impacts.

The methodologies and assumptions used in the preparation of this Chapter follow the CEQA Guidelines developed by the South Coast Air Quality Management District (SCAQMD 2017). Information on existing conditions, and Federal and State standards were obtained from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and SCAQMD. This GHG analysis has been closely coordinated with the air quality analysis in Chapter 7 of this EIR. A stand-alone Air Quality and GHG Impact Analysis report was prepared for the Project and is contained in Appendix C (MIG 2019).

## 11.1 SETTING

### 11.1.1 Environmental Setting

#### **Climate Change**

Climate change is the distinct change in measures of climate for a long period of time. Climate change can result from natural processes and from human activities. Natural changes in the 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 gases and changes to the planet's surface. Emissions affect the atmosphere directly by changing its chemical composition, while changes to the land surface indirectly affects the atmosphere by changing the way the Earth absorbs gases from the atmosphere. The term "climate change" is preferred over the term "global warming" because "climate change" conveys the fact that other changes can occur beyond just the average increase in temperatures near the Earth's surface.

Elements that indicate that climate change is occurring on Earth include:

- Rising of global surface temperatures by 1.3° Fahrenheit (F) over the last 100 years;
- Changes in precipitation patterns;
- Melting ice in the Arctic;
- Melting glaciers throughout the world;
- Rising ocean temperatures;
- Acidification of oceans;



- Range shifts in plant and animal species

Climate change is intimately tied to the Earth's greenhouse effect. The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet; without it, life as we know it on earth would not exist. Human activities since the beginning of the industrial revolution (approximately 150 years) have been adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap energy, thereby contributing to an average increase in the Earth's temperature. Human activities that enhance the greenhouse effect are detailed below.

## Greenhouse Gases

Gases that "trap" heat in the atmosphere and affect regulation of the earth's temperature are known as "greenhouse gases." (GHGs). GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants (discussed in Chapter 7) because climate regulation is global in scale (both in terms of causes and effects).

Some GHGs are emitted to the atmosphere naturally by biological and geological processes, such as evaporation (water vapor), aerobic respiration (carbon dioxide, or CO<sub>2</sub>), and off-gassing from low oxygen environments, such as swamps or exposed permafrost (methane or CH<sub>4</sub>). However, GHG emissions from human activities, such as fuel combustion (e.g., CO<sub>2</sub>) and refrigerant use (e.g., hydrofluorocarbons or HFCs), significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. Human production of GHG has increased steadily since pre-industrial times (approximately pre-1880), and atmospheric CO<sub>2</sub> concentrations have increased from a pre-industrial value of 280 parts per million (ppm) in the early 1800s to 409 ppm in April 2018 (NOAA 2018). The effects of increased GHG concentrations in the atmosphere include increasing shifts in temperature and precipitation patterns and amounts, reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific greenhouse gases – CO<sub>2</sub>, CH<sub>4</sub>, nitrous oxide (N<sub>2</sub>O), and sulfur hexafluoride (SF<sub>6</sub>) and two groups of gases – HFCs and perfluorocarbons (PFCs). These GHGs are the primary GHGs emitted into the atmosphere by human activities. Water vapor is also a common GHG that regulates the earth's temperature; however, the amount of water vapor in the atmosphere can change substantially from day to day, whereas other GHG emissions remain in the atmosphere for longer periods of time. Descriptions of the most common GHGs are described below:

- **Carbon Dioxide (CO<sub>2</sub>)** is emitted and removed from the atmosphere naturally. Animal and plant respiration involve the release of CO<sub>2</sub> from animals and its absorption by plants in a continuous cycle. The ocean-atmosphere exchange results in the absorption and release of CO<sub>2</sub> at the sea surface. CO<sub>2</sub> is also released from plants during wildfires. Volcanic eruptions release a small amount of CO<sub>2</sub> from the Earth's crust.

Human activities that affect CO<sub>2</sub> in the atmosphere include burning of fossil fuels, industrial processes, and product uses. Combustion of fossil fuels used for electricity generation and transportation are the largest source of CO<sub>2</sub> emissions in the United States. When fossil fuels are burned, the carbon stored in them is released into the

atmosphere entirely as CO<sub>2</sub>. Emissions from industrial activities also emit CO<sub>2</sub>, such as cement, metal, chemical production, and use of petroleum produced in plastics, solvents, and lubricants.

- **Methane (CH<sub>4</sub>)** is emitted from human activities and natural sources. Natural sources of CH<sub>4</sub> include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, soils, and wildfires. Human activities that cause CH<sub>4</sub> releases include fossil fuel production, animal digestive processes from farms, manure management, and waste management. CH<sub>4</sub> is produced from landfills as solid waste decomposes. CH<sub>4</sub> is a primary component of natural gas and is emitted during its production, processing, storage, transmission, distribution, and use.
- **Nitrous Oxide (N<sub>2</sub>O)** is emitted from human sources such as agricultural soil management, animal manure management, sewage treatment, combustion of fossil fuels, and production of certain acids. N<sub>2</sub>O is produced naturally in soil and water, especially in wet, tropical forests. The primary human-related source of N<sub>2</sub>O is agricultural soil management due to use of synthetic nitrogen fertilizers and other techniques to boost nitrogen in soils. Combustion of fossil fuels (mobile and stationary) is the second leading source of N<sub>2</sub>O.
- **Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs)** are entirely manmade and are mainly generated through various industrial processes. These types of gases are used in aluminum production, semiconductor manufacturing, and magnesium production and processing.
- **Sulfur Hexafluoride (SF<sub>6</sub>)** is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF<sub>6</sub> occur during maintenance and servicing as well as from leaks of electrical equipment.

GHGs can remain in the atmosphere long after they are emitted. The potential for a particular greenhouse gas to absorb and trap heat in the atmosphere is considered its Global Warming Potential (GWP). The reference gas for measuring GWP is CO<sub>2</sub>, which has a GWP of one. By comparison, CH<sub>4</sub> has a GWP of 25, which means that one molecule of CH<sub>4</sub> has 25 times the effect on global warming as one molecule of CO<sub>2</sub>. Multiplying the estimated emissions for non-CO<sub>2</sub> GHG by their GWP determines their CO<sub>2</sub> equivalent (CO<sub>2</sub>e), which enables a project's combined global warming potential to be expressed in terms of mass CO<sub>2</sub> emissions. The GWPs and estimated atmospheric lifetimes of the common GHG are shown in Table 11-1.

**Table 11-1 Global Warming Potential (GWP) of Common GHGs (100 Year Horizon)**

GHG	GWP	GHG	GWP
Carbon Dioxide (CO <sub>2</sub> )	1	Perfluorocarbons (PFCs)	
Methane (CH <sub>4</sub> )	25	CF <sub>4</sub>	6,500
Nitrous Oxide (N <sub>2</sub> O)	298	C <sub>2</sub> F <sub>6</sub>	9,200
Hydrofluorocarbons (HFCs)		C <sub>4</sub> F <sub>10</sub>	7,000
HFC-23	14,800	C <sub>6</sub> F <sub>14</sub>	7,400
HFC-134a	1,430	Sulfur Hexafluoride (SF <sub>6</sub> )	22,800
HFC-152a	140		
HCFC-22	1,700		

Source: CARB 2014  
 Note: GWPs are based on the United Nations Intergovernmental Panel on Climate Change 4<sup>th</sup> Assessment

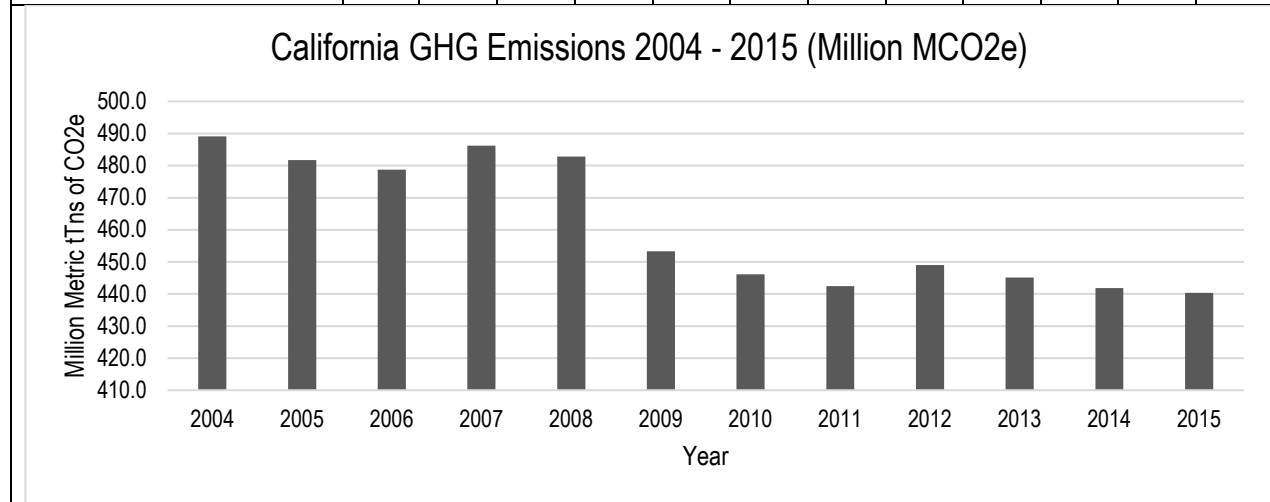
Report.

## Statewide GHG Emissions

CARB prepares an annual Statewide GHG emissions inventory using Regional, State, and Federal data sources, including facility-specific emissions reports prepared pursuant to the State’s Mandatory GHG Reporting Program. The Statewide GHG emissions inventory helps CARB track progress towards meeting the State’s Assembly Bill (AB) 32 GHG emissions target of 431 million metric tons of CO<sub>2</sub> equivalents (MTCO<sub>2</sub>e), as well as to establish and understand trends in GHG emissions<sup>1</sup>. Statewide GHG emissions for the 2005 to 2015 time period are shown in Table 11-2.

**Table 11-2 2004-2015 Statewide GHG Emissions (in the Million MTCO<sub>2</sub>e)**

Scoping Plan Sector	Year											
	'04	'05	'06	'07	'08	'09	'10	'11	'12	'13	'14	'15
Agriculture	34	34	36	36	36	34	35	36	37	35	36	35
Commercial/Residential	44	42	43	43	44	44	45	46	43	43	38	38
Electric Power	115	108	105	114	120	101	90	88	95	90	88	84
High GWP	7	8	8	9	10	11	12	14	15	16	17	19
Industrial	98	95	93	90	90	88	91	90	91	93	93	92
Recycling and Waste	8	8	8	8	8	8	9	9	9	9	9	9
Transportation	182	184	184	184	173	166	163	159	159	158	160	165
<b>Total Million MCO<sub>2</sub>e<sup>(A)</sup></b>	<b>488</b>	<b>480</b>	<b>476</b>	<b>484</b>	<b>481</b>	<b>452</b>	<b>445</b>	<b>442</b>	<b>448</b>	<b>444</b>	<b>442</b>	<b>440</b>



Source: CARB 2017a.

Notes:

(A) Totals may not equal due to rounding. CARB inventory uses GWPs based on the United Nations’ ICC’s 4<sup>th</sup> Assessment Report.

As shown in Table 11-2, Statewide GHG emissions have generally decreased over the last decade, with 2015 levels (440 million MTCO<sub>2</sub>e) approximately 10 percent less than 2004 levels (488 million MTCO<sub>2</sub>e). The transportation sector (165 million MTCO<sub>2</sub>e) accounted for more than one-third (approximately 37.5%) of the State’s total GHG emissions inventory (440 million MTCO<sub>2</sub>e) in 2015.

<sup>1</sup> CARB approved use of 431 MMCO<sub>2</sub>e as the state’s 2020 GHG emission target in May 2014. Previously, the target had been set at 427 MMCO<sub>2</sub>e.

## Climate Change and California

The 2009 California Climate Adaptation Strategy prepared by the California Natural Resources Agency (CNRA) identified anticipated impacts to California due to climate change through extensive modeling efforts. General climate changes in California indicate that:

- California is likely to get hotter and drier as climate change occurs with a reduction in winter snow, particularly in the Sierra Nevada Mountain Range;
- Some reduction in precipitation is likely by the middle of the century;
- Sea levels will rise up to an estimated 55 inches;
- Extreme events such as heat waves, wildfires, droughts, and floods will increase; and
- Ecological shifts of habitat and animals are already occurring and will continue to occur (CNRA 2009).

It should be noted that changes are based on the results of several models prepared under different climatic scenarios; therefore, discrepancies occur between the projections and the interpretation.

## Existing Project Area GHG Emissions

The existing land uses within the Project area contribute to existing City, Regional, and Statewide GHG emissions. The Project area's existing GHG emissions, presented below in Table 11-3, were estimated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. GHG emissions generated within the Project area primarily come from the area, energy, and mobile sources described in Section 7.1.1, Air Quality, as well as the following additional sources specific to GHG emissions:

- **Energy use and consumption:** Emissions generated from purchased electricity and natural gas. CalEEMod estimates motorized vehicle usage associated with the existing land uses within the Project area result in approximately 2,097,010 total vehicle miles traveled (VMT) for the year 2017.
- **Solid waste disposal:** Emissions generated from the transport and disposal of waste generated by land uses. CalEEMod estimates approximately 140.8 tons of solid waste are generated per year by the people working and living within the Project area.
- **Water/wastewater:** Emissions from electricity used to supply water to land uses, and treat the resulting wastewater generated. As estimated in CalEEMod, existing land uses within the Project area use approximately 19.4 million gallons of water per year.

The Project area's existing GHG emissions were estimated using default emissions assumptions provided by CalEEMod, except as noted in Section 7.1 of this EIR.

**Table 11-3 Existing GHG Emissions in the Project Area**

Source	GHG Emissions (Metric Tons / Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total MTCO <sub>2e</sub>
<b>Alexan Foothills Specific Plan Area</b>				
Area	0.33	<0.00 <sup>(A)</sup>	<0.00 <sup>(A)</sup>	0.35
Energy <sup>(B)</sup>	236.17	0.17	0.59	416.38
Mobile <sup>(C)</sup>	696.7	0.04	0.00	697.7
Waste	22.07	1.30	0.00	54.67
Water	42.18	0.47	0.15	100.13
<b>Subtotal<sup>(D)</sup></b>	<b>997.45</b>	<b>1.77</b>	<b>0.75</b>	<b>1,269.2</b>
<b>ZCA Areas A and C</b>				
Area	1.31	<0.00 <sup>(A)</sup>	<0.00 <sup>(A)</sup>	1.35
Energy <sup>(A)</sup>	108.91	0.09	0.31	202.16
Mobile <sup>(B)</sup>	227.335	0.013775	0.00	227.7
Waste	6.51	0.38	0.00	16.13
Water	19.33	0.21	0.07	45.81
<b>Subtotal<sup>(D)</sup></b>	<b>375.36</b>	<b>0.070</b>	<b>0.38</b>	<b>493.2</b>
<b>Combined Total</b>				<b>1,762.4</b>
Source: MIG 2019 (see Appendix C)				
Notes:				
(A) “<0.0” does not indicate the emissions are less than or equal to 0; rather, it indicates the emission is smaller than 0.01, but larger than 0.000.				
(B) The emissions estimated in CalEEMod account for the carbon intensity metrics provided in Southern California Edison’s 2016 Corporate Responsibility and Sustainability Report (SCE 2016) and U.S. Environmental Protection Agency’s eGrid2014v2 emission rates (USEPA 2017).				
(C) CalEEMod 2016.3.2 does not incorporate GHG emissions reductions resulting from the State’s Low Carbon Fuel Standards (LCFS). Although LCFS largely reduces GHG from upstream fuel processing (and not individual tailpipe) the aggregate effect on transportation fuels is a reduction in GHG emissions throughout the state from lower fuel carbon content. Accordingly, this EIR analysis reduces transportation combustion emissions pursuant to LCFS requirements. Based on the latest estimate available from CARB, the LCFS regulation resulted in a 2.5% reduction in average carbon intensity content in 2016 and should result in a 5% reduction in average carbon intensity in 2018. Thus, CalEEMod transportation emissions were adjusted by multiplying by a factor of .95 to account for the LCFS regulation (CARB 2018a, 2018b).				
(D) Totals may not equal due to rounding.				

## State and Regional Energy Setting

According to the California Energy Commission’s (CEC) *2015 Integrated Energy Policy Report*, Californians consumed about 280,500 gigawatt hours (GWh) of electricity in 2014 and 13,240 million BTU of natural gas in 2013. The CEC estimates that by 2025, California’s electricity consumption will reach between 297,618 GWh and 322,266 GWh, an annual average growth rate of 0.54 to 1.27 percent (CEC 2015a), and natural gas consumption is expected to reach between 12,673 million and 13,731 million BTU by 2024, an average annual growth rate of -0.4 to 0.33 percent (CEC 2015a).

Approximately 70 percent of California’s electricity is generated from power plants located within the State and from plants in other states but owned by California utilities. About 10 percent is imported from the Pacific Northwest and 20 percent from the American Southwest (CEC 2011). In-state power is attained from 61.1 percent natural gas, 17.1 renewable energy, and 11.7 percent large hydropower.

Due in part to the State’s emphasis on renewable energy, California is second in leading the nation when it comes to net electricity generation from renewable resources. A top producer of electricity from conventional hydroelectric power, California is also a leader in net electricity

generation from several other renewable energy sources. In 2016, California generated approximately 73,900 GWh of renewable electricity, accounting for 28.9 percent of the State's overall electricity sales (CEC 2017a).

In 2016, total electricity use in Los Angeles County was 69,614 million kilowatt hours (kWh), including 48,759 million kWh of consumption for non-residential land uses (CEC 2017b). Natural gas consumption was 286.9 million BTU in 2016, including 175.8 million therms from non-residential uses (CEC 2017c).

### **11.1.2 Regulatory Setting**

#### **International and Federal**

##### ***International Regulation and the Kyoto Protocol***

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the "United Nations' Framework Convention on Climate Change" agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

##### ***Federal Regulation and the Clean Air Act***

On December 7, 2009, the U.S. EPA issued an endangerment finding that current and projected concentrations of the six Kyoto GHGs in the atmosphere (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub>, HFCs, and PFCs) threaten the public health and welfare of current and future generations. This finding came in response to the Supreme Court ruling in *Massachusetts v. EPA*, which found that GHGs are pollutants under the Federal Clean Air Act. As a result, the U.S. EPA issued its GHG Tailoring Rule in 2010, which applies to facilities that have the potential to emit more than 100,000 MTCO<sub>2</sub>e. In 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA* (No. 12-1146), finding that the U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a permit pursuant to the "Clean Air Act's Prevention of Significant Deterioration" or "Title V" operating permit programs. The U.S. EPA's Greenhouse Gas Reporting Program requires facilities that emit 25,000 MTCO<sub>2</sub>e or more of GHG to report their GHG emissions to the U.S. EPA to inform future policy decisionmakers.

##### ***The Current Administration***

President Trump and the U.S. EPA have stated their intent to halt various federal regulatory activities to reduce GHG emission. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. The timing and consequences of these types of federal decisions and potential responses from California and other states are speculative at this time.

#### **State and Regional**



### **Assembly Bill (AB) 32 (California Global Warming Solutions Act) and Related GHG Goals**

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 establishes the caps on Statewide greenhouse gas emissions proclaimed in Executive Order S-3-05 and established the timeline for meeting State GHG reduction targets. The deadline for meeting the 2020 reduction target is December 31, 2020.

As part of AB 32, CARB determines 1990 GHG emissions levels and projected a “business-as-usual” (BAU)<sup>1</sup> estimate for 2020, to determine the amount of GHG emission reductions that would need to be achieved. In 2007, CARB approved a Statewide 1990 emissions level and corresponding 2020 GHG emissions limit of 427 million MTCO<sub>2e</sub> (CARB 2007). In 2008, CARB adopted its *Climate Change Scoping Plan*, which projects 2020 Statewide GHG emissions levels of 596 million MTCO<sub>2e</sub> and identifies numerous measures (i.e., mandatory rules and regulations and voluntary measures) that will achieve at least 174 million MTCO<sub>2e</sub> of GHG reductions and bring Statewide GHG emissions to 1990 levels by 2020 (CARB 2009).

Executive Order B-30-15, 2030 Carbon Target and Adaptation, issued by Governor Brown in April 2015, set a target of reducing GHG emissions by 40 percent below 1990 levels in 2030. To achieve this ambitious target, Governor Brown identified five key goals for reducing GHG emissions in California through 2030:

- Increase renewable electricity to 50 percent.
- Double energy efficiency savings achieved in existing buildings and make heating fuels cleaner.
- Reduce petroleum use in cars and trucks by up to 50 percent.
- Reduce emissions of short-lived climate pollutants.
- Manage farms, rangelands, forests and wetlands to increasingly store carbon.

By directing State agencies to take measures consistent with their existing authority to reduce GHG emissions, Executive Order B-30-15 establishes coherence between the 2020 and 2050 GHG reduction goals set by AB 32 and seeks to align California with the scientifically established GHG emissions levels needed to limit global warming below two degrees Celsius.

To reinforce the goals established through Executive Order B-30-15, Governor Brown went on to sign Senate Bill (SB) 32 and AB 197 on September 8, 2016. SB 32 made the GHG reduction target (to reduce GHG emissions by 40 percent below 1990 levels by 2030) a requirement, as opposed to a goal. AB 197 gives the Legislature additional authority over CARB to ensure the most successful strategies for lowering emissions are implemented, and requires CARB to, “protect the State’s most impacted and disadvantaged communities ...[and] consider the social costs of the emissions of greenhouse gases.”

**Scoping Plan.** The CARB Scoping Plan is the comprehensive plan primarily directed at identifying the measures necessary to reach the GHG reduction targets stipulated in AB 32. The key elements of the 2008 Plan were to expand and strengthen energy efficiency programs,

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<sup>1</sup> BAU is a term used to define emissions levels without considering reductions from future or existing programs or technologies.

achieve a Statewide renewable energy mix of 33 percent, develop a cap-and-trade program with other partners (including seven States in the United States and four territories in Canada) in the Western Climate Initiative, establish transportation-related targets, and establish fees (CARB 2009). CARB estimated that implementation of these measures will achieve at least 174 million MTCO<sub>2e</sub> of reductions and reduce Statewide GHG emissions to 1990 levels by 2020 (CARB 2009).

In a report prepared on September 23, 2010, CARB indicated 40 percent of the reduction measures identified in the Scoping Plan had been secured (CARB 2010). Although the cap-and-trade program began on January 1, 2012 (after CARB completed a series of activities dealing with the registration process, compliance cycle, and tracking system), covered entities did not have an emissions obligation until 2013. In August 2011, the Scoping Plan was reapproved by CARB with the program's environmental documentation.

On February 10, 2014, CARB released the public draft of the "First Update to the Scoping Plan." "The First Update" built upon the 2008 Scoping Plan with new strategies and recommendations and identified opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. "The First Update" defined CARB's climate change priorities over the next five years and set the groundwork to reach post-2020 goals set forth in Executive Orders S-3-05 and B-16-12. It also highlighted California's progress toward meeting the 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. "The First Update" evaluated how to align the State's long-term GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. "The First Update" to the Scoping Plan was approved by the Board on May 22, 2014.

The second update to the scoping plan, the *2017 Climate Change Scoping Plan* update (CARB 2017c), was adopted by CARB in December 2017. The primary objective for the *2017 Climate Change Scoping Plan* is to identify the measures required to achieve the mid-term GHG reduction target for 2030 (i.e., reduce emissions by 40 percent below 1990 levels by 2030) established under Executive Order B-30-15 and SB 32. The *2017 Climate Change Scoping Plan* identifies an increased need for coordination among State, Regional, and local governments to realize the potential for GHG emissions reductions that can be gained from local land use decisions. It notes that emissions reductions targets set by more than one hundred local jurisdictions in the State could result in emissions reductions of up to 45 MMTCO<sub>2e</sub> and 83 MMTCO<sub>2e</sub> by 2020 and 2050, respectively. To achieve these goals, the 2017 Scoping Plan Update includes a recommended plan-level efficiency threshold of six metric tons or less per capita by 2030 and no more than two metric tons by 2050. The major elements of the *2017 Climate Change Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero emission vehicle (ZEV) buses and trucks.
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewable Portfolio Standard (RPS) to 50 percent and doubles energy efficiency savings by 2030.

- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing CH<sub>4</sub> and hydrocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

### ***Senate Bill 375 (Sustainable Communities and Climate Protection Act)***

In January 2009, California SB 375 went into effect known as the Sustainable Communities and Climate Protection Act. The objective of SB 375 is to better integrate regional planning of transportation, land use, and housing to reduce sprawl and ultimately reduce greenhouse gas emissions and other air pollutants. SB 375 tasks CARB to set GHG reduction targets for each of California's 18 regional Metropolitan Planning Organizations (MPOs). Each MPO is required to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP). The SCS is a growth strategy in combination with transportation policies that will show how the MPO will meet its GHG reduction target. If the SCS cannot meet the reduction goal, an Alternative Planning Strategy may be adopted that meets the goal through alternative development, infrastructure, and transportation measures or policies.

In August 2010, CARB released the proposed GHG reduction targets for the MPOs to be adopted in September 2010. The proposed reduction targets for the SCAG region were eight percent by year 2020 and 13 percent by year 2035. In September 2010 and February 2011, the eight percent and the 13 percent targets were adopted, respectively.

On April 4, 2012, SCAG's Regional Council adopted the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future*. The 2012 RTP/SCS included a strong commitment to reduce emissions from transportation sources to comply with SB 375. The document contained a host of improvements to the region's multimodal transportation system. These improvements included closures of critical gaps in the network that hinder access to certain parts of the region, as well as the strategic expansion of the transportation system where there is room to grow in order to provide the region with greater mobility. The RTP/SCS demonstrated the region's ability to attain and exceed the GHG emission-reduction targets set forth by the CARB and outlined a plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.

SCAG's Regional Council adopted an update to the 2012 RTP/SCS on April 7, 2016, the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016 RTP/SCS). The 2016 RTP/SCS expands upon the 2012 RTP/SCS's goal of balancing future mobility and housing needs with economic, environmental, and public health goals. Included in the 2016

RTP/SCS are 13 major initiatives primarily focused around preserving and maintaining the existing transportation system, expanding and improving mass transit (with a specific emphasis on passenger rail), decreasing reliance on vehicular modes of transportation through the expansion of pedestrian and bicycle infrastructure, and focusing new growth around transit. Through proactive land use planning and improvements to the transportation network, implementation of the 2016 RTP/SCS will result in an eight percent reduction in greenhouse gas emissions per capita by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 when compared with 2005 levels. These reductions meet or exceed the State's mandate, which require an eight percent reduction by 2020 and 13 percent by 2035.

### ***Senate Bill 350 (Clean Energy & Pollution Reduction Act)***

SB 350 was signed into Law in September 2015 and establishes tiered increases to the Renewable Portfolio Standard (RPS). The Bill requires 40 percent of the State's energy supply come from renewable sources by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

### ***Assembly Bill 1493***

With the passage of AB 1493 (Pavley I) in 2002, California launched an innovative and proactive approach for dealing with GHG emissions and climate change at the State level. AB 1493 requires CARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards apply to automobiles and light trucks from 2009 through 2016. Although litigation was filed challenging these regulations and the U.S. EPA initially denied California's related request for a waiver, a waiver has since been granted (CARB 2017b). In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 among light-duty vehicles. In January 2012, CARB approved the Advanced Clean Cars (ACC) program (formerly known as Pavley II) for model years 2017 through 2025. The components of the ACC program are the Low-Emission Vehicle (LEV) regulations and the Zero-Emission Vehicle (ZEV) regulation. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards.

### ***Executive Order (EO) B-30-15, Senate Bill 32 & Assembly Bill 197 (Statewide Interim GHG Targets)***

California EO B-30-15 (April 29, 2015) set an "interim" statewide emission target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 and directed state agencies with jurisdiction over greenhouse gas emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons. Assembly Bill 197 (AB 197) (September 8, 2016) and Senate Bill 32 (SB 32) (September 8, 2016) codified into statute the GHG emissions reduction targets of at least 40 percent below 1990 levels by 2030 as detailed in EO B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities.

## **Title 24 Energy Standards**

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality.” The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC).

CALGreen contains both mandatory and voluntary measures. For non-residential land uses there are 39 mandatory measures including, but not limited to exterior light pollution reduction, wastewater reduction by 20 percent, and commissioning of projects over 10,000 square feet. Two tiers of voluntary measures apply to non-residential land uses, for a total of 36 additional elective measures.

California’s Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 standards, adopted May 9, 2018, will go into effect on January 1, 2020 and improve upon existing standards, focusing on three key areas: proposing new requirements for installation of solar photovoltaics for newly constructed low-rise residential buildings; updating current ventilation and Indoor Air Quality (IAQ) requirements, and extending Title 24 Part 6 to apply to healthcare facilities. The 2019 standards also propose several smaller improvements in energy efficiency.

### ***Center for Biological Diversity v. California Department of Fish and Wildlife***

In its decision in *Center for Biological Diversity v. California Dep’t of Fish and Wildlife (Newhall)* 62 Cal.4th 204 (2015), the California Supreme Court set forth several options that lead agencies may consider for evaluating the cumulative significance of a proposed project’s GHG emissions:

1. A calculation of emissions reductions compared to a “business as usual” (BAU) scenario based upon the emissions reductions in CARB’s Scoping Plan, including examination of the data to determine what level of reduction from BAU a new land use development at the proposed location must contribute in order to comply with statewide goals.
2. A lead agency might assess consistency with AB 32’s goals by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities.
3. Use of geographically specific GHG emission reduction plans to provide a basis for tiering and streamlining of project-level CEQA analysis.

4. A lead agency may rely on existing numerical thresholds of significance for GHG emissions, though use of such thresholds is not required.

There is no applicable existing numerical threshold of significance for GHG emissions and the *Newhall* decision specifically found that use of a numerical threshold is not required.

## **Local**

The City does not have an adopted Climate Action Plan. The City of Monrovia, along with Southern California Edison and Intergy Corporation, prepared an Energy Action Plan that contains goals and specific actions to ensure that sufficient, dependable, and reasonably-priced electrical power and energy supplies are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for the City's consumers and taxpayers. Appendix A to the Energy Action Plan includes the City's environmental accords or actions; however, none of these actions are directly applicable to individual development projects. The Energy Action Plan has not been adopted by the City Council.

## **11.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to global climate change that could result from GHG emissions from the Project, as well as impacts on energy consumption. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **11.2.1 Significance Criteria**

Based on the CEQA Guidelines Appendix G: Items VIII (a) through (b), implementation of the Project would have a significant impact related to greenhouse gas emissions if it would:

- (a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- (b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

In addition, based on CEQA Guidelines Appendix G: Items VI (a) through (b), implementation of Project would have a significant impact related to energy consumption if it would:

- (a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- (b) Conflict with or obstruct a state or local plan for renewable or energy efficiency.

In order to provide guidance to local lead agencies on determining the significance of GHG emissions in their CEQA documents, the SCAQMD convened the first GHG Significance Threshold Working Group (Working Group) meeting on April 30, 2008. To date, the Working Group has convened a total of 15 times, with the last meeting taking place on September 28, 2010. Based on the last Working Group meeting, the SCAQMD identified an interim, tiered approach for evaluating GHG emissions intent on capturing 90 percent of development projects where the SCAQMD is not the lead agency. The following describes the basic structure of the SCAQMD's tiered, interim GHG significance thresholds:

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

### **11.2.2 Analysis Methodology**

Tier 3 and Tier 4 thresholds were used as significance criteria in this analysis to determine if GHG emissions under the Project would have a significant impact on the environment. A project level analysis was applied to the Alexan Foothills Specific Plan since it involves a specific development project pursuant to City regulations; however, a program level analysis was applied to ZCA Areas A and C because a specific development plan is not currently proposed nor considered at this time.

For potential environmental impacts, mitigation measures were designed to avoid or reduce each impact to a less than significant level, where possible.



### **11.2.3 Environmental Impacts**

#### **IMPACT GHG-1 GENERATION OF GREENHOUSE GAS EMISSIONS**

This EIR quantifies and evaluates the potential GHG emissions resulting from both the Alexan Foothills Specific Plan and ZCA Areas A and C. Each individual Project component's GHG emissions are presented and discussed below, and the resulting combined emissions that would occur from both Project components are presented and discussed at the end of this section.

#### **Alexan Foothills Specific Plan**

**Construction Emissions.** Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the development site during demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year until the development is decommissioned. Accordingly, the SCAQMD recommends amortizing construction GHG emissions over a 30-year period. This normalizes construction emissions so that they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. GHG emissions from construction of the proposed Alexan Foothills Specific Plan were estimated using CalEEMod, Version 2016.3.2, based on the anticipated construction schedule and construction activities described in Chapter 7. The estimated construction GHG emissions resulting from the Alexan Foothills Specific Plan are presented below in Table 11-4.

**Table 11-4 Estimated Construction GHG Emissions for the Alexan Foothills Specific Plan**

Construction Year	GHG Emissions (Metric Tons / Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total MTCO <sub>2</sub> e
2020	1,061.7	0.13	0.00	1,064.9
2021	1,297.5	0.11	0.00	1,300.3
2022	292.4	0.03	0.00	293.3
<b>Total</b>	<b>2,651.60</b>	<b>0.27</b>	<b>0.00</b>	<b>2,658.50</b>
<b>Total Amortized Emissions<sup>(A)</sup></b>	<b>88.4</b>	<b>&lt;0.00<sup>(B)</sup></b>	<b>&lt;0.00<sup>(B)</sup></b>	<b>88.5</b>

Source: MIG 2019 (see Appendix C).

Notes:

(A) Emissions amortized over 30 year-period for inclusion in total GHG emissions.

(B) "<0.0" does not indicate the emissions are less than or equal to 0; rather, it indicates the emission is smaller than 0.01, but larger than 0.000.

**Operational Emissions.** Once operational, the Alexan Foothills Specific Plan would result in continuous GHG emissions from mobile, energy, and area sources. Mobile sources would result primarily in emissions of CO<sub>2</sub>, with emissions of CH<sub>4</sub> and NO<sub>2</sub> also occurring in minor amounts. In addition to mobile sources, GHG emissions would also be generated from natural gas usage, electricity use, water conveyance and use, wastewater treatment, and solid waste disposal. Natural gas use would result in the emission of two GHGs: CH<sub>4</sub> (the major component of natural gas) and CO<sub>2</sub> (from the combustion of natural gas). Electricity use associated with both the physical usage of the development, as well as the energy needed to transport

water/wastewater, would result in the production of GHGs if the electricity is generated through non-renewable sources (i.e., combustion of fossil fuels). Solid waste generated by the Project, would contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy when transporting and managing the waste. In addition, landfilling, the most common waste management practice, results in the release of CH<sub>4</sub> from the decomposition of organic materials.

Default energy assumptions were reduced to account for the recent adoption of the 2019 energy efficiency code, and solid waste was assumed to be diverted at a rate of 75% pursuant to AB 341. Potential operational GHG emissions resulting from the Alexan Foothills Specific Plan were modeled using CalEEMod, Version 2016.3.2. The total GHG emissions associated with the Alexan Foothills Specific Plan are presented below in Table 11-5, based on an operational year of 2023. To account for all potential GHG emissions generated through construction and operational activities, the amortized construction emissions calculated in Table 11-4 have been added to Alexan Foothills Specific Plan operational GHG emissions estimate.

As shown in Table 11-5, construction and operation of the Alexan Foothills Specific Plan would result in a net increase in GHG emissions equal to 2,438.3 MTCO<sub>2</sub>e per year. This net emissions increase is below the SCAQMD Tier 3 “bright-line” threshold of 3,000 MTCO<sub>2</sub>e and would thus represent a less than significant impact.

In addition, as shown in Table 11-5, the Alexan Foothills Specific Plan would result in a GHG efficiency of 3.8 MTCO<sub>2</sub>e/yr/service population. This value is below the SCAQMD’s 2020 project-level efficiency target of 4.8 MTCO<sub>2</sub>e/yr/service population; however, the Alexan Foothills Specific Plan would be operational after 2020, in Year 2023. Therefore, it is not necessarily appropriate to compare the 2023 Alexan Foothills Specific Plan GHG efficiency to the SCAQMD 2020 efficiency threshold. Conversely, it is not appropriate to directly compare the 2023 Alexan Foothills Specific Plan GHG efficiency to a 2035 efficiency target since the current modeling does not account for any energy or mobile source improvements embedded in a future efficiency target. Therefore, to compare the Alexan Foothills Specific Plan to the SCAQMD 2035 efficiency target of 3.0 MTCO<sub>2</sub>e/yr/service population, operational emissions were modeled using CalEEMod Version 2016.3.2 with the operational year set to 2035, to reflect the expected reduction in energy and mobile source emissions that will occur with implementation of the State RPS and advances in vehicle emission and other standards adopted by the State (see Section 11.1.2). The 2035 modeling only accounted for changes to energy and mobile source emissions as a result of increased renewable energy generation under the RPS standard and fleet turnover and improved vehicle emission standards associated with a 2035 operational year. The 2035 amortized construction and operational emissions for the Alexan Foothills Specific Plan, as estimated using CalEEMod (see Appendix C), are estimated to be 2,961.4 MTCO<sub>2</sub>e/yr. Dividing through by the service population for the Alexan Foothills Specific Plan (980 residents), the result Year 2035 GHG efficiency is 3.0 MTCO<sub>2</sub>e/yr/service population, which does not exceed the SCAQMD 2035 efficiency target of 3.0. Thus, the proposed Alexan Foothills Specific Plan would result in less than significant levels of GHG emissions and not impede progress towards the State’s GHG reduction goals.

**Table 11-5 Estimated Operational GHG Emissions for the Alexan Foothills Specific Plan**

Emission Source	GHG Emissions (MTCO <sub>2e</sub> / Year)		
	Existing <sup>(A)</sup>	Proposed	Net Change
Area	0.4	7.8	+7.5
Energy	416.4	1,298.2	+881.8
Mobile <sup>(B)</sup>	697.7	2,002.4	+1,304.7
Waste	54.7	25.4	-29.3
Water	100.1	285.12	+185.0
Amortized Construction	–	88.5	+88.3
<b>Total<sup>(C)</sup></b>	<b>1,269.2</b>	<b>3,707.5</b>	<b>+2,438.3</b>
SCAQMD Tier 3 Screening Threshold	–	–	3,000
SCAQMD Tier 3 Threshold Exceeded?	–	–	No
Estimated Service Population <sup>(D)</sup>	133 <sup>(E)</sup>	980 <sup>(F)</sup>	+847
Estimated GHG Efficiency (MTCO <sub>2e</sub> /yr/service population)	9.5	3.8	-5.7
SCAQMD Tier 4 Project-Level Efficiency Threshold	–	4.8	–
<b>SCAQMD Tier 4 Threshold Exceeded?</b>	–	No	–

Source: MIG 2019 (see Appendix C).  
 Notes:  
 (A) See Table 11-3 for existing GHG emissions in Alexan Foothills Specific Plan area.  
 (B) CalEEMod 2016.3.2 does not incorporate GHG emissions reductions resulting from the State's LCFS. Although LCFS largely reduces GHG from upstream fuel processing (and not individual tailpipe) the aggregate effect on transportation fuels is a reduction in GHG emissions throughout the state from lower fuel carbon content. Accordingly, this EIR analysis reduces transportation combustion emissions pursuant to LCFS requirements. Based on the latest estimate available from CARB, the LCFS regulation resulted in a 2.5% reduction in average carbon intensity content in 2016 and should result in a 5% reduction in average carbon intensity in 2018. The current LCFS regulation also requires a 10% reduction in average carbon intensity by 2020. Thus, CalEEMod transportation emissions were adjusted by multiplying by a factor of .95 (existing conditions) and 0.90 (Project) to account for the LCFS regulation (CARB 2018a, 2018b).  
 (C) Totals may not equal due to rounding.  
 (D) Service population is defined as the number of employees and residents living and working within the area. The existing land uses include a mix of employees and residents; however, the Alexan Foothills Specific Plan service population used is based on residents only.  
 (E) Based upon the U.S. Green Building Council's (2008) average SF/employee: Place of Worship is 6,630 square feet (SF)/1,250 SF/employee = 5.3 employees, for General Light Industrial is 56,190 SF/463 SF/employee = 121.4 employees, and Office Building (100,000 SF or less) is 706 SF/221 SF/employee = 3.19 employees. According to the U.S. Census Bureau the average household size in Monrovia is 2.77 persons (1 unit X 2.77 persons/unit = 2.77 persons). This yields a total service population of 133.  
 (F) According to the U.S. Census Bureau, the average persons per bedroom in Monrovia is 1.536. Given this, under the scenario of 439 units, the Alexan Foothills Specific Plan would accommodate 980 residents (Studio: 24 x 1 x 1.536 = 37; 1 Bedroom: 232 x 1 x 1.536 = 356; 2 Bedrooms: 167 x 2 x 1.536 = 513; and 3 Bedroom: 16 X 3 X 1.536 = 74). A total of 436 units is proposed under the Alexan Foothills Specific Plan, however, 439 units were analyzed.

### Mitigation Measures

No mitigation measures are required.

### ZCA Areas A and C

The short-term construction and long-term operational emissions associated with buildout of ZCA Areas A and C were estimated using the same methodology (CalEEMod) as described above for the Alexan Foothills Specific Plan. As was done for the Alexan Foothills Specific Plan modeling, default energy assumptions were reduced to account for the recent adoption of the 2019 energy efficiency code, and solid waste was assumed to be diverted at a rate of 75%

pursuant to AB 341. Although traffic buildout of ZCA Areas A and C was calculated in the TIA (see Appendix J), default trip generation rates for the these areas were used for emissions calculations. The use of default trip generation rates is likely to overestimate mobile source emissions since the proximity of ZCA Areas A and C to the Monrovia Metro Station is likely to reduce vehicle trips compared to default values. The construction and operational emissions associated buildout of ZCA Areas A and C are summarized in Tables 11.6 and 11.7 below.

**Table 11-6 Estimated Construction GHG Emissions for Buildout of ZCA Areas A and C**

Source	GHG Emissions (Metric Tons / Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total MTCO <sub>2e</sub>
<b>Annual Average Construction GHG Emissions</b>				
2021	209.82	0.03	0.00	210.67
2022	166.35	0.03	0.00	166.98
<b>Total</b>	<b>376.2</b>	<b>0.06</b>	<b>0.00</b>	<b>377.65</b>
<b>Total Amortized Emissions<sup>(A)</sup></b>	12.54	0.002	0	12.59

Source: MIG 2019 (see Appendix C).  
 Note:  
 (A) Emissions amortized over 30 year-period for inclusion in total GHG emissions.

**Table 11-7 Total GHG Emissions for Buildout of the ZCA Areas A and C**

Source	GHG Emissions (MTCO <sub>2e</sub> / Year)		
	Existing <sup>(A)</sup>	Buildout	Net Change
Area	1.4	1.4	+0.06
Energy	202.2	193.34	-8.8
Mobile <sup>(B)</sup>	227.7	569.3	+341.6
Waste	16.1	4.7	-11.4
Water	45.8	53.23	+7.5
Amortized Construction	–	12.6	+12.6
<b>Total<sup>(C)</sup></b>	<b>493.2</b>	<b>834.7</b>	<b>+341.5</b>
SCAQMD Tier 3 Screening Threshold	–	–	3,000
SCAQMD Tier 3 Threshold Exceeded?	–	–	No
Estimated Service Population <sup>(D)</sup>	55 <sup>(E)</sup>	227 <sup>(F)</sup>	+172
Estimated GHG Efficiency (MTCO <sub>2e</sub> /yr/service population)	9.6	3.7	-5.9
SCAQMD Tier 4 Plan-Level Efficiency Threshold	–	6.6	–
<b>SCAQMD Tier 4 Threshold Exceeded?</b>	–	No	–

Source: MIG 2019 (see Appendix C).

Notes:

(A) See Table 11-3 for existing GHG emissions in Alexan Foothills Specific Plan area.

(B) CalEEMod 2016.3.2 does not incorporate GHG emissions reductions resulting from the State's LCFS. Although LCFS largely reduces GHG from upstream fuel processing (and not individual tailpipe) the aggregate effect on transportation fuels is a reduction in GHG emissions throughout the state from lower fuel carbon content. Accordingly, this EIR analysis reduces transportation combustion emissions pursuant to LCFS requirements. Based on the latest estimate available from CARB, the LCFS regulation resulted in a 2.5% reduction in average carbon intensity content in 2016 and should result in a 5% reduction in average carbon intensity in 2018. The current LCFS regulation also requires a 10% reduction in average carbon intensity by 2020. Thus, CalEEMod transportation emissions were adjusted by multiplying by a factor of .95 (existing conditions) and 0.90 (Project) to account for the LCFS regulation (CARB 2018a, 2018b).

(C) Totals may not equal due to rounding.

(D) Service population is defined as the number of employees and residents living and working within the area. The existing land uses include a mix of employees and residents; however, the service population used for ZCA Areas A and C is based on residents only.

(E) Based upon the U.S. Green Building Council's (2008) average SF/employee for: General Light Industrial is

14,560 SF/463 SF/employee = 31.4 employees, and for Warehouse is 10,120 SF/781 SF/employee = 13 employees. According to the U.S. Census Bureau the average household size in Monrovia is 2.77 persons (4 units x 2.77 persons/unit = 11.08). This yields a total service population of 55.  
 (F) According to the U.S. Census Bureau, the average household size in Monrovia is 2.77 persons (2.77 persons/unit X 82 units = 227.1) = 227 residents at full buildout.

As shown in Table 11-7, construction and operation of ZCA Areas A and C would result in a net increase in GHG emissions equal to 341.5 MTCO<sub>2e</sub> per year. This net emissions increase is below the SCAQMD Tier 3 threshold of 3,000 MTCO<sub>2e</sub> and would thus represent a less than significant impact; however, it would be inappropriate to use this threshold since buildout of ZCA Areas A and C is being analyzed at a programmatic level. Instead, the total GHG emissions associated with buildout of ZCA Areas A and C are evaluated on a per capita basis to determine if GHG emissions would be consistent with the SCAQMD's Tier 4 analysis. As shown in Table 11-7, the proposed buildout of ZCA Areas A and C in Year 2023 falls below the SCAQMD's 2020 GHG efficiency target of 6.6 MTCO<sub>2e</sub>/yr/service population, as well as the SCAQMD's 2035 GHG efficiency target of 4.8 MTCO<sub>2e</sub>/yr/service population. Therefore, anticipated development within ZCA Areas A and C would result in less than significant impacts to GHG emissions.

### Mitigation Measures

No mitigation measures are required.

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

As described in Section 7.2.3 (see Impact AIR-1), this EIR assumes that construction and operation of the Alexan Foothills Specific Plan and ZCA Areas A and C would occur simultaneously, meaning that both construction and operational emissions for both Project components would overlap and be emitted at the same time. The combined net GHG emissions associated with buildout of the Alexan Foothills Specific Plan and ZCA Areas A and C in Year 2023 are presented below in Table 11-8.

**Table 11-8 Total Combined GHG Emissions for the Alexan Foothills Specific Plan and ZCA Areas A and C (Year 2023)**

Source	GHG Emissions (MTCO <sub>2e</sub> / Year)		
	Existing <sup>(A)</sup>	Project Buildout <sup>(B)</sup>	Net Change
Area	1.7	9.3	+7.6
Energy	618.5	1,491.6	+873.1
Mobile	925.4	2,571.7	+1,664.3
Waste	70.8	30.1	-40.7
Water	145.9	338.5	+192.5
Amortized Construction	–	101.1	+101.1
<b>Total<sup>(C)</sup></b>	<b>1,762.4</b>	<b>4,542.2</b>	<b>+2,779.8</b>
SCAQMD Tier 3 Screening Threshold	–	–	3,000
SCAQMD Tier 3 Threshold Exceeded?	–55	–	No
Estimated Service Population	184	1,207	+1,096
Estimated GHG Efficiency (MTCO <sub>2e</sub> /yr/service population)	9.6	3.8	-
SCAQMD Tier 4 Project-Level Efficiency Threshold	–	4.8	–
SCAQMD Tier 4 Threshold Exceeded?	–	No	–
Source: MIG 2019 (see Appendix C)			

Notes:

- (A) See Table 11-3 for the existing emissions within the Project area.
- (B) See Tables 11-5 and 11-7 for buildout emissions for the Alexan Foothills Specific Plan and ZCA Areas A and C, respectively.
- (C) Totals may not equal due to rounding.

As shown in Table 11-8, buildout of the full Project would result in a 2,779.8 MTCO<sub>2</sub>e increase in GHG emissions from existing conditions. This is below the SCAQMD Tier 3 threshold of 3,000 MTCO<sub>2</sub>e.

As stated previously, the Alexan Foothills Specific Plan is being analyzed at a project level, while buildout of ZCA Areas A and C is being evaluated at a programmatic level. As a conservative (i.e., worst-case) evaluation of potential GHG emission impacts, the combined GHG efficiency of both the Alexan Foothills Specific Plan and ZCA Areas A and C was determined and compared to the SCAQMD's project level Tier 4 efficiency threshold. As shown in Table 11-8, the combined efficiency threshold for the Alexan Foothills Specific Plan and ZCA Areas A and C (3.7 MTCO<sub>2</sub>e/yr/service population) in Year 2023 would not exceed the SCAQMD 2020 plan GHG efficiency target of 4.8 MTCO<sub>2</sub>e/yr/service population but would be above the SCAQMD's 2035 project efficiency threshold of 3.0 MTCO<sub>2</sub>e/yr/service population. As explained above, the operational emissions for the Alexan Foothills Specific Plan as well as ZCA Areas A and C were modeled under year 2035 conditions to account for changes to energy and mobile source emissions as a result continued implementation of the RPS, fleet turnover, and improved vehicle emissions standards; all other inputs were held to 2023 values (e.g., energy efficiency, carbon intensity of SCE electricity, LCFS reductions, solid waste diversion rates, etc.). The 2035 operational emissions (including amortized construction emissions), as estimated using CalEEMod (see Appendix C), are estimated to be 3,630 MTCO<sub>2</sub>e per year. Dividing through by the combined service population (1,207) results in a combined efficiency 3.0 MTCO<sub>2</sub>e/yr/service population, which does not exceed the SCAQMD 2035 project-level target of 3.0 MTCO<sub>2</sub>e/yr/service population. Therefore, impacts are less than significant.

## Mitigation Measures

No mitigation measures are required.

## IMPACT GHG-2 PLAN CONSISTENCY

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

#### *CARB Scoping Plan*

As discussed under Section 11.1.2, the *2017 Climate Change Scoping Plan* is CARB's primary document used to ensure state GHG reduction goals are met. The *2017 Climate Change Scoping Plan's* primary objective is to identify the measures needed to achieve the 2030 reduction target established under Executive Order B-30-15 and SB 32. The major elements of the plan are generally geared toward actions either CARB or other state entities will pursue, such as, but not limited to:

- Implementing the LCFS, with an increased stringency (18 percent by 2030);
- Implementation of SB 350, which expands the RPS to 50 percent and doubles energy efficiency savings; and

- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing CH<sub>4</sub> and hydrocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by the year 2030.

Although most of these measures would be implemented at the State level, the GHG reductions achieved by these state measures would be realized at the local level. For example, regardless of actions taken by the City, emissions generated through gasoline combustion in motor vehicles within Monrovia would produce less GHG in 2030 than they do now. As shown in Table 11-8, the proposed Alexan Foothills Specific Plan and ZCA Areas A and C would meet the recommended plan-level efficiency threshold of 6 MTCO<sub>2e</sub> per capita per year by 2030 and would therefore contribute to the substantial progress necessary to achieve the *2017 Climate Change Scoping Plan* target of a 2 MTCO<sub>2e</sub> per capita per year threshold in Year 2050. The Project, therefore, would not conflict with the goals of the *2017 Climate Change Scoping Plan*.

In addition to State measures, Appendix B to CARB's *2017 Climate Change Scoping Plan* identifies potential actions that could be undertaken at a local level to support the State's climate goals. This appendix is organized into two categories. Category A applies to code and broad planning documents and is not applicable to a Specific Plan. Category B includes measures that could be considered for individual projects. The Alexan Foothills Specific Plan and ZCA Areas A and C would be consistent with many of the suggested measures in Appendix B through required compliance with SCAQMD rules and the California Green Building Standards Code. The Project, therefore, would not conflict with the goals of the *2017 Climate Change Scoping Plan*.

### **SCAG 2016 RTP/SCS**

As described previously, the *2016 RTP/SCS* is a growth strategy and transportation plan whose primary intent is to demonstrate how the SCAG region will meet its GHG reduction target through the year 2040. Many of the measures included in the RTP/SCS are focused on: the expansion of, and access to, mass transit (e.g., light rail, commuter rail, bus rapid transit, etc.); planning growth around livable corridors; and locating new housing and job growth in high quality transit areas. Approval of the Project would support these goals, because it (1) results in and encourages infill development and/or involves the revitalization of already developed areas, (2) has existing, supporting transit infrastructure and enhances the use of this infrastructure (the METRO Station is a 0.2-mile walk from to the east of the Project area boundary), and (3) encourages the use of non-vehicular modes of transportation.

Under California law, SCAG is required to implement strategies that reduce per capita GHG emissions in the region by eight percent by 2020—compared with 2005 levels—and by 13 percent by 2035 (SCAG 2016). Although the existing emissions in the Project area have not been estimated for Year 2005, it is very likely that 2005 GHG emissions levels (and efficiency metrics) would be higher than the Year 2018 existing conditions presented in Table 11-3. As shown in Table 11-8, the Project is anticipated to reduce per capita GHG emissions by approximately 64 percent from existing conditions, which exceeds the progress needed to achieve the mandated reduction in GHG emissions of 13 percent by 2035. One of the reasons the Project results in such low GHG emissions is the Project area's proximity to the Monrovia METRO Station. As described in more detail in Chapter 19, Transportation and Circulation, the proximity of this transit station to the Project area is estimated to reduce Project-related trips by 20%.



Since the implementation of the Project would result in transit-oriented development, support the use of mass transit, and result in vehicle trips that are approximately 20% lower than standard values due to the proximity of the Monrovia METRO station, the Project would be consistent with the SCAG 2016 RTP/SCS.

### ***Energy Action Plan***

The City of Monrovia has an *Energy Action Plan* that seeks to decrease energy use and dependence. The plan suggests the need for citizen involvement and focuses heavily on actionable items related to managing City facilities and vehicles. Additionally, the City requires consistency with energy saving strategies (such as Title 24 which requires energy efficient practices). The Project is consistent with Title 24 building codes, and therefore is consistent with the goals of the Energy Action Plan.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT GHG-3 ENERGY CONSUMPTION**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Short-term energy demand would result from construction activities occurring as a result of buildout of the Project. Short-term demand would include energy needed to power worker and vendor vehicle trips as well as construction equipment. Long-term energy demand would result from operation of businesses and land uses within the Project area, which would include activities such as lighting, heating and cooling of structures, etc. Operational energy demands would typically result from vehicle trips, electricity and natural gas usage, and water and wastewater conveyance.

As estimated by the TIA (refer to Appendix J) and the emissions modeling conducted using CalEEMod defaults, buildout of the Project is anticipated to result in an increase in vehicle miles traveled (VMT) by approximately 19,813 VMT daily, natural gas consumption by 209,426.2 kBTU annually, and electricity consumption by 626 kWh annually. Although VMT and energy consumption increases, consumption rates per capita would decrease. Buildout of the Project would result in a VMT decrease from 26.2 VMT/service population/day to 20.4 VMT/service population/day. Natural gas consumption would also reduce from 3,175.6 kBTU/service population/year to 657.6 kBTU/service population/year, and annual electricity consumption would decrease from 4,984.6 kWh/service population/year to 760.4 kWh/service population/year.

Although implementation of the Project may increase VMT and energy and natural gas usage compared to current conditions, increased density would provide for more efficient use of resources within the City, thus ensuring that the Project would not result in the wasteful or inefficient use of energy resources. This would be a less than significant impact.

In addition, as discussed under Impact GHG-2, the Project would be consistent with CARB's Scoping Plan and SCAG's RTP/SCS which also incorporate goals for use of renewable energy and efficient energy use as well as for reducing GHG emissions. Therefore, the Project would be consistent with applicable State and local plans for promoting use of renewable energy and energy efficiency.

## Mitigation Measures

No mitigation measures are required.

### 11.2.4 Impact Conclusions

The Project would not result in greenhouse gas emissions in excess of thresholds of significance, would meet SCAQMD's 2035 project-level target of 3.0 MTCO<sub>2</sub>e/yr/service population, and would not conflict with the CARB Scoping Plan, SCAG 2016 RTP/SCS, or City's Energy Action Plan. In addition, the Project would not result in wasteful or inefficient use of energy. Therefore, impacts on global climate change due to greenhouse gas emissions and impacts on energy consumption would be less than significant.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
AB	Assembly Bill
ACC	Advanced Clean Cars
AQ	air quality
BAU	Business As Usual
BTU	British Thermal Unit
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBSC	California Building Standards Commission
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH <sub>4</sub>	methane
CNRA	California Natural Resources Agency
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	Carbon Dioxide
EIR	Environmental Impact Report
EO	Executive Order
F	Fahrenheit
GHG	Greenhouse Gas(es)
GWh	Gigawatt-hours
GWP	Global Warming Potential
HFCs	hydrofluorocarbons
IAQ	Indoor Air Quality
kBtu	Thousand British Thermal Units
kWH	kilowatt-hours
LCFS	Low Carbon Fuel Standard
LEV	Low Emission Vehicle
MPO	Metropolitan Planning Organization
MTCO <sub>2</sub> e	Metric Tons of Carbon Dioxide Equivalents
No.	number
NOAA	National Oceanic and Atmospheric Administration
N <sub>2</sub> O	nitrous dioxide
PFCs	perfluorocarbons

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ppm	parts per million
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
SB	Senate Bill
SCE	Southern California Edison
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SF <sub>6</sub>	sulfur hexafluoride
SP	Specific Plan
U.S.	United States
U.S. EPA	United States Environmental Protection Agency
V.	Versus
VMT	Vehicle Miles Traveled
ZEV	Zero Emission Vehicle
Yr	year
§	section
° F	degrees Fahrenheit

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## **12. HAZARDS AND HAZARDOUS MATERIALS**

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This EIR Chapter describes hazards and hazardous materials in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

A Phase I Environmental Site Assessment was completed for the Alexan Foothills Specific Plan area (FREY Environmental 2017), and a Phase II Hazardous Waste Investigation (i.e., subsurface investigation) performed at one parcel within the Alexan Foothills Specific Plan area at 1625 S. Magnolia Avenue (Partner 2011). Surveys for lead-based paint (LBP) and asbestos containing material (ACM) were conducted on two residential units in the Alexan Foothills Specific Plan area (Patriot 2015a & b, 2016a & b). Each hazardous waste investigation report is contained in Appendix G of this EIR. Finally, radiofrequency (RF) radiation emissions were modeled for the two existing telecommunications towers located at 410 W. Evergreen Avenue in the Alexan Foothills Specific Plan area (EBI Consulting [EBI] 2018). Pursuant to Section 15150 of the CEQA Guidelines, these documents are incorporated herein by reference into the EIR and are included in Appendix G.

### **12.1 SETTING**

The environmental and regulatory setting of the Project area with respect to hazards and hazardous materials is described based on local, State and Federal regulations along with information from Monrovia General Plan's Safety Element (City of Monrovia 2002), and the studies noted above.

#### **12.1.1 Environmental Setting**

##### **History of Uses within the Project Area**

Historically, the Project area was used for agricultural purposes. The first development with residential and industrial buildings occurred in the early 1950s. Historical and current usage includes automotive service and sales, furniture manufacturing, theme park prop/decoration manufacturing, and residential.

##### **Hazardous Materials and Hazardous Waste**

Industrial uses in Monrovia generally consist of light manufacturing and manufacturing uses. Some industrial businesses use hazardous materials for manufacturing processes and can generate large quantities of hazardous waste. The Environmental Protection Agency (U.S. EPA) defines hazardous materials as materials that may be dangerous or potentially harmful to human health, or the environment (see 12.1.2, Regulatory Setting, below). Hazardous materials are often by-products of manufacturing uses or waste from commercial products such as cleaning fluids or pesticides. The U.S. EPA and other federal, state, and county regulatory agencies closely monitor manufacturing and commercial uses, and the disposition of hazardous materials. Hazardous materials require special methods of storage and treatment that common sewage and drainage systems are not capable of handling. Improper disposal can harm the environment and people who work in the waste management industry. Commercial businesses that typically handle hazardous materials and generate small quantities of hazardous waste include dry cleaners, auto repair shops, medical facilities, and photo processing centers. Generators of large quantities of hazardous waste include chemical manufacturers, large electroplating facilities, and petroleum refineries.



Photo 1  
One of the cell towers (a monotree) in Alexan Foothills Specific Plan area.



Photo 2  
Protective fencing around cell towers in Alexan Foothills Specific Plan area.

**Figure 12-1** Cell Tower Photos



A Phase I Environmental Site Assessment (ESA) is the initial investigation phase of a process established by the American Society for Testing and Materials (ASTM) Standards (ASTM E 1527-13), cited by the Superfund Cleanup Acceleration Act of 1998, as adequate due diligence by new purchasers of properties or their lenders prior to site development (see Section 12.1.2 below). Phase I ESAs are completed prior to property development by private parties to establish that the buyer has exercised due diligence in purchasing the site. If a Phase I ESA indicates evidence of site contamination, a Phase II ESA is typically required prior to site development to further investigate the potential for contamination of that project's site. A Phase II ESA typically involves collection of samples of soil, groundwater, air, and/or building materials to measure and analyze quantities of various contaminants. The most frequent substances tested for include petroleum hydrocarbons, heavy metals, pesticides, solvents, asbestos, lead-based paint, and mold. Appropriate cleanup levels for each contaminant are determined by lead jurisdictional agencies as described in Section 12.1.2 below.

In 2011, a Phase I ESA and Phase II ESA were performed at 1625/1625 H and 1631 S. Magnolia Avenue and 410 W. Evergreen by a previous owner in the Alexan Foothills Specific Plan area due to past and recent industrial use of the properties. The Phase I ESA and Phase II ESA are contained in Appendix G of this EIR. Under the Phase II ESA, sampling of soil and soil vapor was performed to test for petroleum/chlorinated hydrocarbons, polychlorinated biphenyls (PCBs), pesticides, and metals due to historic and recent industrial use of the properties.

Trichlorofluoromethane, a refrigerant, was detected in one soil gas sample. No soil gas regulatory guidelines are currently established for the detected refrigerant (see Appendix G). In addition, tertiary-butyl alcohol (TBA) was detected in one soil sample, but a deeper sample in the same boring was non-detect for volatile organic compounds indicating very localized contamination on the soil surface.

The organochlorine pesticide, Endosulfan I, was detected in one composite soil sample at concentrations below available regulatory guidelines (i.e., Regional Screening Levels, please see Appendix G). The peak concentration of Endosulfan I detected was 5.5 µg/kg, a small fraction of the Regional Screening Level of 370,000 µg/kg for residential areas. Metals were also detected in soil samples, however concentrations were below applicable regulatory guidelines (see Appendix G). Other than trichlorofluoromethane discussed above, there were no other elevated concentrations of target contaminants, detected in soil gas or soil during the investigation.

In 2015 and 2016, surveys for ACM and LBP were conducted in two residences in the Alexan Foothills Specific Plan area (418 W. Evergreen and 1613 S. Magnolia Avenue). ACM and LBP were found in both structures. The two residences were demolished after the ACM and LBP had been removed for off-site disposal, in accordance with all applicable laws.

A follow-on Phase I ESA was conducted specifically for the entire Alexan Foothills Specific Plan area (FREY Environmental 2017). The following items were identified as Recognized Environmental Conditions ("RECs") in this Phase I ESA, pursuant to ASTM E 1527-13:

- Historical automobile maintenance operations;
- Possible storage of hazardous materials in 55-gallon drums;
- Railroad tracks south of the Site (possible use of chemicals for weed/pest control);
- Chemicals used at the California Theaming facility; and
- Chemicals used / stored at the 1631 S. Magnolia Avenue address.

However, the report noted that the previous, comprehensive Phase II ESA conducted by Partner in 2011 had adequately assessed these RECs through soil and soil vapor sampling,

finding that no further investigation was warranted. The 2017 Phase I ESA thus concluded that above RECs presented minimal risk and found the issues to be resolved.

According to the Phase I ESA conducted for the Alexan Foothills Specific Plan (FREY Environmental 2017) and confirmed by MIG in 2018, the Department of Toxic Substances Control (DTSC) has identified three hazardous waste sites off the Project site in Monrovia that have undergone voluntary cleanup according to DTSC's EnviroStor database, three of which are within 1,000 feet of the Project site at 1622 S. Magnolia Avenue and 200/204 W. Pomona Avenue. All three sites have been cleaned up and closed.

The State Water Resources Control Board (SWRCB) lists all leaking underground storage tanks (LUSTs) identified throughout California. There are no LUSTs or any other sites within 1,000 feet of the Project site (SWRCB 2018).

Hazardous materials are routinely used and transported throughout Monrovia, particularly along I-210.

### **Radiofrequency Radiation Hazards**

Telecommunications towers emit electromagnetic energy termed "radiofrequency radiation" or "RF emissions" that can be harmful to humans if exposed at certain levels (Federal Communications Commission 1999). Specifically, if exposed at close range, electromagnetic energy can heat body tissue rapidly resulting in tissue damage (FCC 1999).

Telecommunications towers typically contain a receiver often located on the ground, and an antenna that must have a clear line of sight to the horizon, and therefore, is often installed high above the ground (FCC 1999). Radiofrequency radiation is emitted from the antennae of telecommunications towers, typically high above the ground, and their energy is focused very close to the antennae, such that human exposures to high levels of radiofrequency radiation is very unlikely, except for workers maintaining the antennae (FCC 1999). Nevertheless, the FCC has established exposure limits to radiofrequency radiation for members of the public and has developed requirements for their location, orientation, and design to ensure that public exposure limits can be met.

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) (EBI 2018). Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public (EBI 2018).

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure (EBI 2018). Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table 12-1, which is included within the FCC’s Office of Engineering and Technology Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are “time-averaged” limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC’s MPEs are measured in terms of power (mW) over a unit surface area (cm<sup>2</sup>). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm<sup>2</sup>) and an uncontrolled MPE of 1 mW/cm<sup>2</sup> for equipment operating in the 1900 MHz and 2500 MHz frequency ranges.

**Table 12-1 Limits for Maximum Permissible Exposure (MPE) to Radiofrequency Radiation**

<b>(A) Limits for Occupational/Controlled Exposure</b>				
<b>Frequency Range (MHz)</b>	<b>Electric Field Strength (E) (V/m)</b>	<b>Magnetic Field Strength (H) (A/m)</b>	<b>Power Density (S) (mW/cm<sup>2</sup>)</b>	<b>Averaging Time [E]<sup>2</sup>, [H]<sup>2</sup>, or S (minutes)</b>
0.3 – 3.0	614	1.63	(100)*	6
3.0 – 30	1842/f	4.89/f	(900/f <sup>2</sup> )*	6
30 – 300	61.4	0.163	1.0	6
300 – 1,500	--	--	f/300	6
1,500 – 100,000	--	--	5	6
<b>(B) Limits for General Public/Uncontrolled Exposure</b>				
<b>Frequency Range (MHz)</b>	<b>Electric Field Strength (E) (V/m)</b>	<b>Magnetic Field Strength (H) (A/m)</b>	<b>Power Density (S) (mW/cm<sup>2</sup>)</b>	<b>Averaging Time [E]<sup>2</sup>, [H]<sup>2</sup>, or S (minutes)</b>
0.3 – 3.0	614	1.63	(100)*	30
3.0 – 30	824/f	2.19/f	(180/f <sup>2</sup> )*	30
30 – 300	27.5	0.073	0.2	30
300 – 1,500	--	--	f/1,500	30
1,500 – 100,000	--	--	1.0	30
Notes: f = Frequency in (MHz) * Plane-wave equivalent power density				

Two existing commercial wireless telecommunications towers (also referred to as “cell towers”) are located in the Alexan Foothills Specific Plan area’s northwest corner and are governed by a lease held by a separate owner than the Alexan Foothills Specific Plan Project applicant. The towers are located at 410 W. Evergreen Avenue, immediately west of the westernmost fire lane entrance to the property and are surrounded by several existing structures located immediately beneath the towers. Currently, there is restrictive fencing with warning signs around the cell towers to provide a safe setback for the public from the towers (see Figure 12-1).

## **Emergency Response and Wildland Fires**

Please see Chapter 18.0, Public Services, for the discussion of the City of Monrovia's emergency response program and wildland fire response capabilities, led by Monrovia Fire and Rescue.

## **Airport Hazards**

Monrovia is not within the sphere of influence or Airport Planning Area of any airports. The closest commercial airport, Ontario International, is approximately 24 miles east from the Project area. A single-runway general aviation airport, San Gabriel Valley Airport (formerly El Monte Airport) is the closest airport and is approximately 3.7 miles southwest from the Project Area.

### **12.1.2 Regulatory Setting**

#### **Federal**

The main Federal agencies that regulate hazardous materials include the U.S. Environmental Protection Agency (U.S. EPA) and Occupational Safety and Health Administration (OSHA) and are described below. The Federal Communications Commission (FCC) also is responsible for establishing guidelines and providing direction for determining compliance with human exposure levels to radiofrequency radiation emitted from telecommunications towers; FCC is described in more detail below as well.

#### ***U.S. Environmental Protection Agency (U.S. EPA)***

The U.S. EPA is responsible for researching and setting national standards for a variety of environmental programs, and delegates to States and local governments the responsibility for issuing permits and monitoring and enforcing compliance. U.S. EPA regulates chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices; protects workers and the community (along with OSHA and California Occupational Safety and Health Administration [CalOSHA], see below); and is responsible for integrating the Federal Clean Water Act and Clean Air Act into California legislation.

#### ***Federal Occupational Safety and Health Administration (OSHA)***

OSHA establishes and enforces Federal regulations related to health and safety of workers exposed to toxic and hazardous materials. OSHA also sets health and safety guidelines for construction activities and manufacturing facility operations.



Photo 1  
One of the cell towers (a monotree) in Alexan Foothills Specific Plan area.



Photo 2  
Protective fencing around cell towers in Alexan Foothills Specific Plan area.

**Figure 12-1** Cell Tower Photos

### **Federal Communications Commission**

The Federal Communications Commission (FCC) is responsible for establishing guidelines and providing direction for determining compliance with human exposure levels to radiofrequency radiation emitted from telecommunications towers. Specifically, FCC's Office of Engineering and Technology Bulletin No. 65, on "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radio Frequency Radiation" dated August 1997, specifies guidelines for locating, orienting, and testing telecommunications towers for their safe operation.

### **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. Chapter 103)**

The following Federal laws and guidelines govern hazardous waste management and remediation in the Project area:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Superfund Amendments and Reauthorization Act Title III (SARA)

CERCLA and SARA are described in more detail below. In addition, the following Federal laws and guidelines govern hazardous materials storage and handling in the Project area, although proposed uses under the Project would not result in the utilization of a large amount of hazardous materials.

- Resource Conservation and Recovery Act (RCRA)
- Toxic Substances Control Act (TSCA)
- Occupational Safety and Health Act

Section 9603(a) of CERCLA requires immediate notification of all appropriate government agencies by any person in charge of an onshore facility of any knowledge of any release of a hazardous substance at levels exceeding prescribed volumetric thresholds (42 U.S.C. 9603[a]).

The President of the United States delegates enforcement authority of CERCLA to the U.S. Environmental Protection Agency (U.S. EPA) as the lead responsible Federal agency under CERCLA. The U.S. EPA can then delegate to State authorities to enforce CERCLA. In California, U.S. EPA can delegate authority to the California Environmental Protection Agency's DTSC (for cases involving soil or soil vapor contamination for example). Further, DTSC can then delegate authority to enforce CERCLA to local agencies, such as the Los Angeles County Fire Department's Health Hazardous Materials Division's Site Mitigation Unit, but only through Local Agency Oversight Agreements with those agencies.

Whenever any hazardous substance is released or there is a substantial threat of such a release into the environment at levels exceeding prescribed volumetric thresholds, or there is a release or substantial threat of release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health or welfare, the responsible government agency is authorized to act to remove or arrange for the removal of the hazardous substance, pollutant, or contaminant at any time (42 U.S.C. 9604).

The owner of the facility, or person who owned or operated the facility at the time of the release, is liable to pay for all costs associated with removal or remediation of the contamination (42 U.S.C. 9607(a)). "Innocent landowners", "contiguous landowners", or "*bona fide* prospective purchasers" of contaminated property (as defined by CERCLA), may not be liable to pay for costs associated with removal or remediation of the contamination if they follow certain procedures in CERCLA. Specifically, "innocent landowners", "contiguous landowners", or "*bona fide* prospective purchasers" must make "All Appropriate Inquiries" (or "AAI") into a property's

environmental conditions prior to purchase of a property in order to obtain protection from liability of past contamination under CERCLA. “Innocent landowners”, “contiguous landowners”, or “*bona fide* prospective purchasers” however, are still required to provide all legally required notices with respect to discovery of any hazardous substances at a facility (42 U.S.C 9607[q][1][A][vii] (i.e., notify the appropriate government agencies of any knowledge of releases) and cooperate fully with any investigation or removal or remedial action (42 U.S.C. 9607[q]).

The 2002 Small Business Liability Relief and Brownfields Revitalization Act (the “Brownfields Amendments”) amended CERCLA (Public Law 107-118) and requires U.S. EPA to promulgate regulations establishing standards and practices for conducting AAI. Phase I Environmental Site Assessments (ESA) and Phase II Environmental Site Assessments (ESA) are reports that can be prepared by innocent landowners, contiguous landowners, and *bona fide* prospective purchasers of property in order to meet CERCLA’s AAI requirements to receive protection from liability under CERCLA. Specific practices and procedures have been established to prepare Phase I ESAs and Phase II ESAs to this end, which are established in ASTM standards E1527-13 and E1903-11, respectively. A Phase I ESA involves an evaluation of the potential for past releases of hazardous substances at a site, or a REC. The ASTM E 1527-13 standard also recognizes the concept of a “*de minimis* condition,” as the presence of hazardous substances or petroleum products in form or extent which generally do not present a material risk to human health and would not likely be subject to enforcement action if brought to the attention of governmental agencies. ASTM E 1527-13 further specifies that the term REC does not include *de minimis* conditions. A Phase II ESA is performed to attempt to confirm whether a release of hazardous substance has occurred at levels above a *de minimis* environmental condition for a REC. Phase I and II ESAs, however, are primarily utilized by owners or prospective purchasers to make informed business decisions, and to assist owners or prospective purchasers in meeting CERCLA’s AAI criteria to avoid liability for purchase of contaminated property.

Under the CERCLA process, official documents required to investigate and clean up contamination include Preliminary Assessments (PAs)/Site Inspections (SIs) (PA/SIs) and Remedial Investigations (RIs)/Feasibility Studies (FSs) (RI/FSs) as defined in CERCLA. While there are many similarities between Phase I and Phase II ESAs and PA/SIs and RI/FSs, and results of Phase I and Phase II ESAs can be used to complete PA/SIs and RI/FSs, PA/SIs and RI/FSs are more comprehensive and follow certain requirements under the CERCLA process as described below from U.S. EPA’s *Guidance for Preparing Preliminary Assessments Under CERCLA* (U.S. EPA 1991):

***“Preliminary Assessment:*** *A PA is a limited-scope investigation performed by States and/or EPA on every CERCLIS [site subject to CERCLA] site. PA investigators collect readily available information and conduct a site and environs reconnaissance. The PA is designed to distinguish between sites that pose little or no threat to human health and the environment and sites that require further investigation. The PA also identifies sites requiring assessment for possible emergency response actions.*

***Site Inspection (SI):*** *If the PA recommends further investigation, an SI is performed. SI investigators typically collect waste and environmental samples to determine the substances present at a site and whether they are being released to the environment. The objective of the SI is to identify which sites have a high probability of qualifying for the NPL [National Priority List]. A second objective is to identify sites posing immediate health or environmental threats which require emergency response.*

***Remedial Investigation (RI):*** *An RI is conducted at all NPL sites. The RI is a field investigation to characterize the nature and extent of contamination at a site. The RI supports development, evaluation, and selection of the appropriate response alternative.*



***Feasibility Study (FS):*** *Based on the data collected during the RI, options for final remedial actions are developed and evaluated in the FS. The most viable cleanup options are evaluated based on several criteria: ability to protect human health and the environment; long- and short-term effectiveness; ability to comply with applicable State and Federal requirements; ability to reduce waste toxicity, mobility, or volume; implementability; State and community acceptance; and cost.”*

Typically, detailed Human Health Risk Assessments and possibly Ecological Risk Assessments are performed during the RI stage following U.S. EPA and State guidance.

Once notification of knowledge of a release of a hazardous substance at levels exceeding prescribed volumetric standards has been made to a responsible government agency, the lead government agency will conduct a Pre-CERCLA Screening (PCS) process to confirm that the CERCLA process applies to the release. During this process, the lead regulatory agency can make the determination that there is sufficient documentation clearly demonstrating no likelihood of a release that could cause significant adverse environmental or human health impacts (U.S. EPA 2016). Examples of sufficient documentation may include, but are not limited to (U.S. EPA 2016):

- A completed removal action of all sources and releases with documentation of no remaining contamination due to the site release;
- Documentation showing no occurrences of hazardous substance releases;
- A comprehensive remedial investigation or equivalent data showing no release above applicable or relevant and appropriate requirements (ARARs) (i.e., numeric thresholds established by State or Federal regulatory agencies or laws);  
or
- A completed EPA-approved risk assessment showing no risk.

If the lead regulatory agency concludes that CERCLA applies to a release of a hazardous substance, the site is added to U.S. EPA’s CERCLIS active inventory database of CERCLA sites. Next, completion of the Site Assessment process is conducted including completion of a PA, and potentially an SI, RI, and FS to investigate the contamination and determine the appropriate removal or remedial action if necessary. Per the Superfund Amendments and Reauthorization Act (SARA) including Title III, the Emergency Response and Community Right-to-Know Act (EPCRA), the CERCLA cleanup process is a public process with various required steps involving public input into the investigation and cleanup decision-making process.

## **State**

### **CEQA**

The CEQA Guidelines are required to define a “significant effect on the environment” as occurring where, among other things, “the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly” (Public Resources Code, § 21083[b][3]).

In *California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)* 62 Cal.4th 369 (2015), the Court found that a lead agency is required to evaluate the existing condition, or the presence of contamination in the soil, as part of its environmental review, because new ground disturbance could threaten dispersal of any settled contamination.

***California Environmental Protection Agency (Cal/EPA)/Office of Emergency Services***

The California Environmental Protection Agency (Cal/EPA) establishes regulations governing the use of hazardous materials in the State to protect air, water, and soil, as well as proper disposal and cleanup of hazardous waste. The Office of Emergency Services (OES) coordinates State and local agencies and resources for educating, planning, and warning citizens of hazardous materials and related emergencies, including organized response efforts in case of emergencies.

### ***California Department of Toxic Substances Control (DTSC)***

DTSC is a branch of Cal/EPA and regulates cleanup of hazardous substances and wastes, oversees remedial investigations, protects drinking water from toxic contamination, and warns the public that could potentially be exposed to listed carcinogens.

### ***California Highway Patrol/California Department of Transportation***

The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) have primary regulatory responsibility for the transportation of hazardous wastes and materials.

### ***California Occupational Safety and Health Administration (CalOSHA)***

The California Occupational Safety and Health Administration (CalOSHA) is responsible for promulgating and enforcing State health and safety standards and implementing the Federal Occupational Health and Safety Act as well as the California Occupational Health and Safety Act. For example, CalOSHA's regulatory purview includes provisions to minimize the potential for release of asbestos and lead during construction and demolition activities.

### ***Regional Water Quality Control Board (RWQCB)***

One of nine regional boards in the State, the Los Angeles Regional Water Quality Control Board (RWQCB) protects surface and groundwater quality from pollutants discharged or threatened to be discharged to the Waters of the State. The RWQCB issues and enforces the National Pollutant Discharge Elimination System (NPDES) permits and regulates leaking underground storage tanks and other sources of groundwater contamination. More details on the NPDES program are described in Chapter 13.0, Hydrology and Water Quality.

### ***South Coast Air Quality Management District (SCAQMD)***

The South Coast Air Quality Management District (SCAQMD) regulates the demolition of buildings and structures that may contain asbestos. The SCAQMD is vested with the authority to regulate airborne pollutants through both inspection and law enforcement and is to be notified 10 days in advance of any proposed demolition or abatement work.

Specifically, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires work practices that limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM. Rule 1403 also requires surveys of any facility being demolished or renovated for the presence of all friable and Class I and Class II non-friable ACM.

## **California Health and Safety Code (HSC), Division 20, Chapter 6.8, Hazardous Substances Account**

Chapter 6.8 of Division 20 of the California Health and Safety Code (HSC) also establishes a program for State cleanup processes to provide for response authority for releases of hazardous substances, including spills and hazardous waste disposal sites, that pose a threat to the public health or the environment. Section 25319.5 of Chapter 6.8 of the HSC requires the preparation of a Preliminary Endangerment Assessment (PEA) to determine if a past release has occurred on a site and if it has the potential to result in a threat to public health or the environment. PEAs contain much of the information required in PA/SIs under CERCLA (DTSC 2015), but also involve completion of screening level Human Health Risk Assessments and possibly Ecological Risk Assessments. Completion of a PEA is a formal step in the State cleanup process and can also be used to satisfy AAI under CERCLA (DTSC 2015).

DTSC oversees the PEA process and grants some flexibility regarding the focus of the PEA (DTSC 2015). As under CERCLA, the PEA process is a public process involving public noticing and a public comment period (DTSC 2015).

### **Local**

#### ***Los Angeles County Department of Environmental Health***

The Los Angeles County Department of Environmental Health operates the Household and Small Business Hazardous Waste Collection Program.

#### ***Los Angeles County Fire Department (LACFD)***

The Los Angeles County Fire Department operates the Community Emergency Response Team (CERT) program. The Program trains and certifies members of the public in basic emergency response and organizational skills, including light fire suppression, hazardous materials awareness, first aid, light search and rescue techniques, and disaster response assistance.

***LACFD, Health Hazardous Materials Division (HHMD).*** The HHMD requires a business plan to be prepared, submitted, and implemented by any business handling hazardous materials or a mixture containing a hazardous material. The HHMD requires business plans for all hazardous waste generators, regardless of quantity generated, and for any business that uses quantities of hazardous materials, including insecticides, fungicides, rodenticides, and Class I explosives. County inspections reduce risks associated with exposure to hazardous materials and adverse effects on the environment. The federal government and the State of California require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to submit a business plan to its local Certified Unified Program Agency (CUPA). The Monrovia Fire Department is the local CUPA. The Site Mitigation Unit of the HHMD has been delegated some authority by DTSC to oversee the investigation and remediation of certain contaminated sites undergoing voluntary cleanups in Los Angeles County under Chapter 6.5 of Division 20 of California Health and Safety Code (LACoFD 2019).

### ***Monrovia Fire and Rescue***

Monrovia Fire and Rescue is the local lead for emergency response in the City, although mutual aid agreements exist for neighboring cities and LACFD. There are two fire stations in Monrovia; Fire Station 102 is approximately 0.5 mile southeast of the Project area. More discussion on the impacts on Fire Protection Services is contained in Chapter 18.0, Public Services.

## **12.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to hazards and hazardous materials that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for t ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **12.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items IX (a) through (g), implementation of the Project would have a significant impact related to hazards and hazardous materials if it would:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- (e) For a project located within an airport Land Use Plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in or outside the Planning Area;
- (f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or
- (g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impacts on emergency response (criteria [f]) and wildland fire (criteria [g]) are discussed in Chapter 18.0, Public Services, and are not discussed further in this Chapter.

### **12.2.2 Environmental Impacts**

#### **IMPACT HAZ-1 HAZARDOUS MATERIALS MANAGEMENT**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Construction under the Project would involve the temporary use and transport of fuels, lubricating fluids, solvents, paints, and other hazardous materials that have the potential to be spilled. However, implementation of standard Best Management Practices (BMPs) for management of hazardous materials during construction would be required through the land use clearance and building permit processes. Therefore, construction impacts on hazardous materials management would be less than significant.

Proposed new residential units under the Project would not be expected to result in an increased use of hazardous materials. Rather, replacement of residential uses for industrial uses would result in a decreased use in hazardous materials. Therefore, the Project is expected to result in a net benefit on hazardous materials management over the long term.

##### **Mitigation Measures**

No mitigation measures are required.

#### **IMPACT HAZ-2 HAZARDOUS WASTE**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Trichlorofluoromethane, a refrigerant, was detected in one soil gas sample. No soil gas regulatory guidelines are currently established for the detected refrigerant (see Appendix G). In addition, tertiary-butyl alcohol (TBA) was detected in one soil sample, but a deeper sample in the same boring was non-detect for volatile organic compounds indicating very localized contamination on the soil surface. In addition, the organochlorine pesticide, Endosulfan I, was detected in one composite soil sample at concentrations below available regulatory guidelines (i.e., Regional Screening Levels, please see Appendix G). The peak concentration of Endosulfan I detected was 5.5 µg/kg, a small fraction of the Regional Screening Level of 370,000 µg/kg for residential areas. Metals were also detected in soil samples, but at levels below applicable regulatory guidelines (see Appendix G). Other than trichlorofluoromethane discussed above, there were no other elevated concentrations of target contaminants, detected in soil gas or soil during the investigation.

Detection of trichlorofluoromethane in soil vapor, and detection of tertiary-butyl alcohol (TBA) and Endosulfan I in soil samples above Practical Quantitation Limits (PQLs), indicate a potential release of hazardous substances onto the subject property. This evidence of a release is subject to notification under CERCLA and the California Health and Safety Code Division 20, Chapter 6.8. As such, DTSC, or another regulatory agency delegated authority by DTSC to investigate and remediate the contaminated property (i.e., the Los Angeles County Fire Department's Health Hazardous Materials Division's Site Mitigation Unit) (herein referred to as designee), must be notified of the potential release and a Pre-CERCLA Screening/scoping process must be performed by DTSC, or designee, to determine if the potential release is subject to review under the CERCLA process and California Health and Safety Code Division 20, Chapter 6.8.

Project construction activities have the potential to exacerbate conditions by spreading contamination resulting in exposure of construction workers and future occupants of the buildings to hazardous substances. The presence of these materials will be addressed by the

applicant in accordance with all applicable laws, including without limitation as they relate to worker protection (e.g., pursuant to Occupational Safety and Health Administration ["OSHA"] and California-OSHA guidelines) and plans to excavate the TBA-affected soil for off-site disposal at a licensed disposal facility, in accordance with all applicable laws. Further, if the source of trichlorofluoromethane is identified, the applicant would be required to excavate all trichlorofluoromethane-impacted soil for off-site disposal at a licensed disposal facility, in accordance with all applicable laws.

However, failure to fully investigate and remove or remediate the contamination as required pursuant to CERCLA and the California Health and Safety Code Division 20, Chapter 6.8, as dictated by DTSC or its designee, would potentially result in exposure of construction workers or future residents to hazardous substances having the potential to cause adverse health effects. Without mitigation, impacts would be significant.

Similarly, potential releases of hazardous substances within ZCA Areas A and C and failure to fully investigate and remove or remediate the contamination as required pursuant to CERCLA and California Health and Safety Code Division 20, Chapter 6.8, as dictated by DTSC or its designee, would potentially result in exposure of construction workers or future residents to hazardous substances having the potential to cause adverse health effects. Without mitigation, impacts would be significant.

Mitigation measures HAZ-1 and HAZ-2 require compliance with the CERCLA and California Health and Safety Code Division 20, Chapter 6.8 processes for the investigation and removal or remediation of contamination on the Project site, if required, prior to grading. With implementation of these mitigation measures, the hazardous substances detected on the Project site would be effectively addressed and worker protection and future residents would be safeguarded.

Finally, one existing residence in the Alexan Foothills Specific Plan area (at 418 W. Evergreen), is known to contain asbestos-containing material and lead-based paint. Additional structures older than 1950 in ZCA Areas A and C may also contain asbestos-containing material and/or lead-based paint. Demolition of these structures without proper testing and abatement of these materials would be a significant impact. Therefore, implementation of mitigation measure MM HAZ-3 shall be required to properly test for and abate ACM and LBP in the Project area. With implementation of this measure, ACM and LBP impacts would be reduced to less than significant levels.

## **Mitigation Measures**

Mitigation measure MM HAZ-1 applies to the Alexan Foothills Specific Plan. Mitigation measure MM HAZ-2 applies to future development within ZCA Areas A and C. Mitigation measure MM HAZ-3 applies to both.

**MM HAZ-1:** To the extent required under law on the concentrations detected at the Project, the Department of Toxic Substances Control (DTSC), or another regulatory agency delegated authority by DTSC to investigate and remediate the contaminated property (i.e., the Los Angeles County Fire Department's Health Hazardous Materials Division's Site Mitigation Unit) (herein referred to as designee), shall be notified of the results of the results of the Phase I Environmental Site Assessments (ESA) and Phase II (ESA) prepared for the Alexan Foothills Specific Plan. All requirements of DTSC, or its designee, shall be complied with prior to issuance of grading and demolition permits for the portion of the development subject to CERCLA or California Health and Safety Code Division 20, Chapter 6.8. The TBA-impacted soil will be excavated for off-site disposal at a licensed disposal facility, in accordance with all applicable laws. In addition, soil sampling will be performed in the vicinity of the

trichlorofluoromethane impacts to soil vapor and, if the source of trichlorofluoromethane in soil is identified, the trichlorofluoromethane-affected soil will also be excavated for off-site disposal at a licensed disposal facility, in accordance with all applicable laws. **Requirements and Timing:** The measures specified above shall be performed prior to grading and demolition in the portions of the development subject to CERCLA or California Health and Safety Code Division 20, Chapter 6.8 **Monitoring:** To the extent that contaminant concentrations are detected at levels exceeding prescribed volumetric thresholds, prior to issuance of grading and demolition permits for any portion of the development subject to CERCLA or California Health and Safety Code Division 20, Chapter 6.8, City Planning shall obtain documentation that DTSC, or its designee, signs off and approves of the development to commence grading and demolition.

**MM HAZ-2.** Prior to receipt of land use clearance for developments involving ground disturbance in ZCA Area A and C, a Phase I Environmental Site Assessment (ESA) must be performed in accordance with ASTM standards to determine the potential for contamination at the project site and need for further investigation or cleanup. If results of the Phase I ESA indicate the need for further investigation, a Phase II ESA shall be performed to further determine the nature and extent of contamination and forwarded to the DTSC, or another regulatory agency delegated authority by DTSC to investigate and remediate the contaminated property (i.e., the Los Angeles County Fire Department's Health Hazardous Materials Division's Site Mitigation Unit) (herein referred to as designee). If a Phase II ESA is required, all requirements of DTSC, or its designee, shall be complied with prior to issuance of grading and demolition permits for the portion of the development subject to CERCLA and the California Health and Safety Code. **Requirements and Timing:** The measures specified above shall be performed prior to grading and demolition in the portions of the development subject to CERCLA and California Health and Safety Code Division 20, Chapter 6.8. **Monitoring:** Prior to issuance of grading and demolition permits for any portion of the development subject to CERCLA and California Health and Safety Code, City Planning shall obtain documentation that DTSC, or its designee, signs off and approves of the development to commence grading and demolition.

**MM HAZ-3.** Prior to demolition of structures older than 1950 in the Project area, a survey for lead-based paint (LBP) and asbestos containing material (ACM) shall be performed. Prior to issuance of demolition or building permits, copies of the survey report(s) shall be submitted to the City of Monrovia for review and sign off. Prior to the start of demolition or construction, the applicant shall provide the City with copies of all notifications submitted to the South Coast Air Quality Management District (SCAQMD) for proposed demolition, as well as documentation of agency sign off on any abatement activities completed. **Requirements and Timing:** A LBP and ACM survey report shall be submitted to the City for review and approval prior to issuance of demolition and building permits. Notifications shall also be submitted to the SCAQMD prior to issuance of demolition and building permits. Documentation of signoff by the SCAQMD on any abatement activities performed shall be provided prior to City sign off on demolition or construction. **Monitoring:** City staff shall review and approve of LBP and ACM reports and shall confirm notifications are made to the SCAQMD prior to issuance of demolition or building permits. City staff shall confirm that the SCAQMD has signed off on any abatement activities prior to City sign off on demolition or construction.



## IMPACT HAZ-3 RADIOFREQUENCY RADIATION

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

The two existing telecommunications towers at 410 W. Evergreen Avenue were located and oriented to comply with FCC regulations and Chapter 17.46, Wireless Telecommunications Facilities, of the Monrovia Municipal Code, which ensures that exposure limits to workers and to the public are met. Existing protective fencing and warning signs are in place to ensure the public adheres to safe setbacks from the cell towers. No new structures are currently proposed in closer proximity than existing structures to the two existing telecommunications towers in the Alexan Foothills Specific Plan area or in ZCA Areas A and C.

Project features within the Alexan Foothills Specific Plan have also been designed around the telecommunications towers and the existing structures beneath them to reflect they are proposed to remain in place. However, new buildings associated with the Alexan Foothills Specific Plan area would be taller than existing structures near the telecommunications towers. In addition, one new structure located near the towers to the southwest would incorporate a rooftop deck for use by residents. Therefore, RF radiation emissions were modeled for the existing telecommunications towers to determine exposure levels for the new development both on the ground and at the elevation of the rooftop decks (EBI 2018). Table 12-2 presents the results of modeled RF emissions as percentages of the maximum possible exposure (MPE) limits set by the FCC.

**Table 12-2 Modeled RF Emissions at Resident Locations Compared with Maximum Permissible Exposure (MPE) Limits**

Location	% of FCC General Public/Uncontrolled Exposure Limit	% of FCC Occupational/Controlled Exposure Limit	Power Density (mW/cm <sup>2</sup> )
<b>All Carrier Equipment</b>			
Ground	10.20	2.04	0.1020
Roof Deck	1.29	0.26	0.0129

Using worst-case predictive modeling, it was determined that exposure limits would be met - that the new proposed development would not create or expose people to a hazardous situation or exacerbate public or worker exposure to RF radiation (EBI 2018). The RF Report does recommend that members of the public maintain a minimum of a 3-foot setback from the antenna; this measure is already met through the existing protective fencing and signage. Therefore, no members of the public would be expected to be that close to the antenna, and, this setback is met. Therefore, potential impacts from RF radiation would be less than significant.

### Mitigation Measures

No mitigation measures are required.

## IMPACT HAZ-4 AIRPORTS

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

There are no private or public airports near the Project area. Therefore, implementation of the Project would not result in a safety hazard related to airports and would not conflict with any airport Land Use Plan. No impact would occur.

### Mitigation Measures

No mitigation measures are required.

### 12.2.3 Impact Conclusions

With implementation of mitigation measures MM HAZ-1 through MM HAZ-3, potentially significant hazards and hazardous materials/waste impacts would be reduced to less than significant levels.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
A/m	amperes per meter
ACM	asbestos containing materials
ASTM	American Society for Testing and Materials
BMPs	Best Management Practices
Cal/EPA	California Environmental Protection Agency
CalOSHA	California Occupational Safety and Health Administration
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Emergency Response, Compensation, and Liability Act
CERT	Community Emergency Response Team
CHP	California Highway Patrol
CUPA	Certified Unified Program Agency
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FCC	Federal Communications Commission
GP	General Plan
HHMD	Health Hazardous Materials Division
LACFD	Los Angeles County Fire Department
LBP	lead-based paint
LUST	Leaking underground storage tank
mHz	megahertz
MPE	maximum permissible exposure
mW/cm <sup>2</sup>	milliwatts per square centimeter
NIH	National Institutes of Health
NPDES	National Pollutant Discharge Elimination System
OES	Office of Emergency Services
OSHA	Occupational Safety and Health Administration
PQL	Practical Quantitation Limits
REC	recognized environmental condition
RF	radiofrequency radiation

RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SWRCB	State Water Resources Control Board
V/m	volts per meter
ZCA	Zoning Code Amendment
µg/kg	micrograms per kilogram

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## **13. HYDROLOGY AND WATER QUALITY**

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This EIR Chapter describes existing hydrology and water quality conditions in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project and describes potential impacts that could result from the Project.

This analysis is based in part upon a Hydrology and LID Report prepared for the Alexan Foothills Specific Plan (PSOMAS 2018) (Appendix H), a Water Supply Assessment (WSA) prepared for the Alexan Foothills Specific Plan (Stetson Engineers 2018) (Appendix K), and various sub-pages available on the Monrovia's website at:

<http://www.cityofmonrovia.org/your-government/public-works>

Impacts on groundwater supply and other water-supply related issues are discussed also in EIR Chapter 20 (Utilities and Service Systems).

### **13.1 SETTING**

#### **13.1.1 Environmental Setting**

##### **Groundwater**

The Project area is within the Main San Gabriel groundwater basin, Monrovia's primary water source. The Main San Gabriel Basin freshwater storage capacity is estimated to be approximately 8.7 million acre-feet (AF). Approximately 1.0 million AF of this groundwater basin is actively managed to provide the local public water supply, including importing supplemental water to recharge the basin. The City pumps groundwater from five active wells with a combined capacity of approximately 10,000 gallons per minute (gpm). Water from these wells currently serves approximately 36,600 people with 9,600 service connections.

##### **Surface Hydrology and Water Quality**

The Project area contains commercial, industrial, and residential buildings, paved parking surfaces, other hardscape, and landscaping. The City's drainage channel segment adjacent to the Alexan Foothills Specific Plan and within the Project area does not typically contain water (PSOMAS 2017). At the Mayflower Avenue/Evergreen Avenue intersection northwest of the Project area, water within the City's channel is normally routed along Mayflower Avenue within a drainage system maintained by Los Angeles County. However, during high flow events, water will continue down the portion of the City's channel within the Project area. South of the Project area, the City's channel continues below Genoa Street before entering the Peck Road Channel, a reinforced concrete pipe, maintained by Los Angeles County.

Under existing conditions, the Alexan Foothills Specific Plan area drains in a southerly direction through a concrete swale and pavement and sheet flow into the southwest existing concrete channel. No formal stormwater retention facilities are located in the Project area other than the drainage channel. Existing surface hydrologic conditions in the Alexan Foothills Specific Plan area are depicted in Figure 13-1 (PSOMAS 2018) and summarized in Table 13-1.

**Table 13-1 Specific Plan Pre-Developed/Existing Condition in a 50-Year Storm Frequency**

Drainage Area	Area (acres)	Imperviousness	Q <sub>50</sub> (cfs)	V <sub>50</sub> (acre-feet)
1A	6.72	90%	20.7	3.33
Source: Psomas 2018 (see Appendix H). Notes: Cfs cubic feet per second Q <sub>50</sub> Flow rate during a 50-year storm V <sub>50</sub> Volume during a 50-year storm				

### **Flooding and Other Hydrologic Hazards**

According to the San Gabriel Valley Association of Cities (2018), no area within Monrovia is subject to 100-year floods. A review of Federal Emergency Management Agency (FEMA) maps (FEMA 2018), also confirms that the Project area is not located within a mapped floodplain.

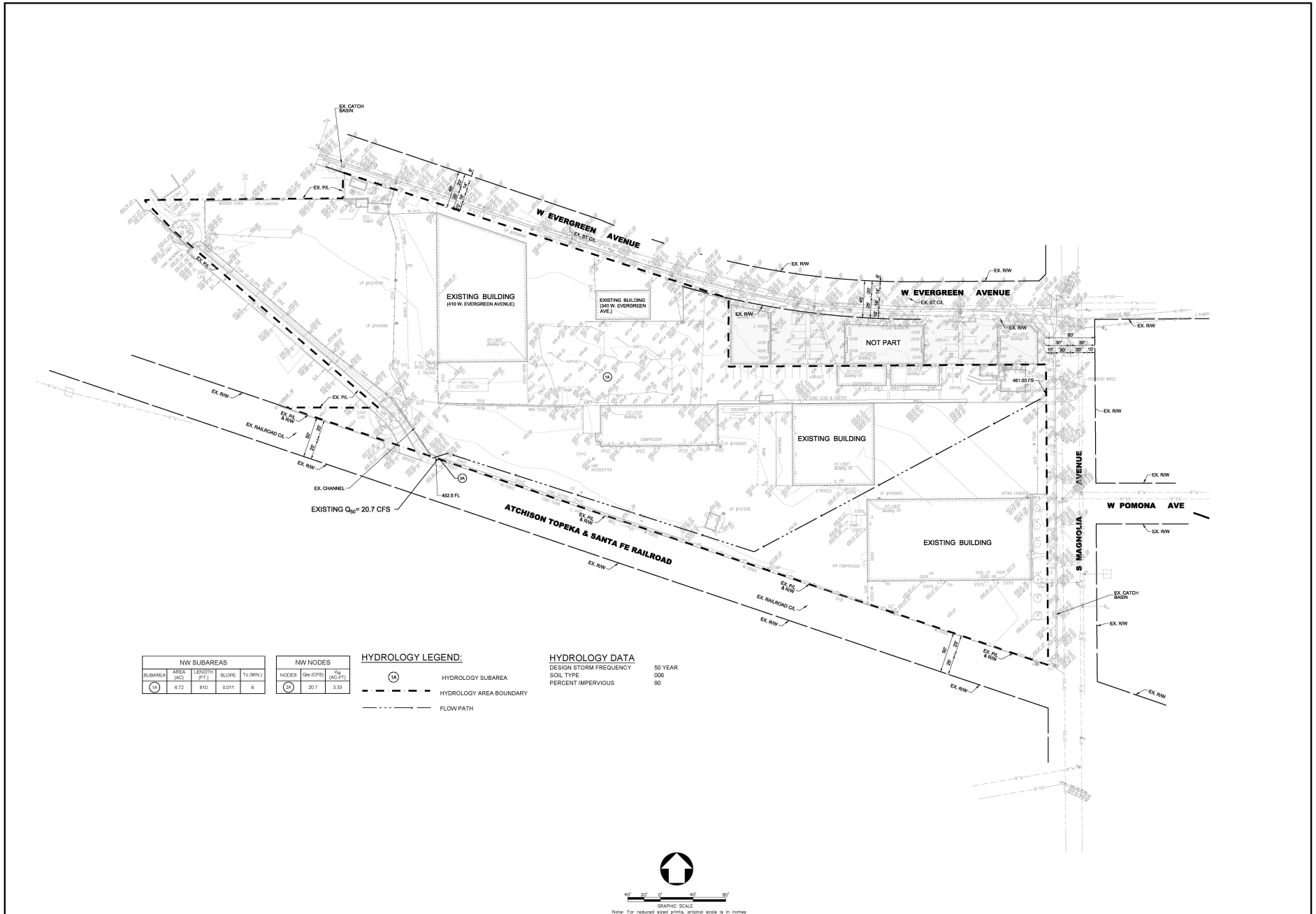
According to the Safety Element of the City’s General Plan (City of Monrovia 2002), the Project area is within the inundation areas of the Santa Anita Dam, and the Sawpit Debris Basin. The combined capacity of the Santa Anita Dam and Sawpit Debris Dam is 1,852 AF. Santa Anita Dam, built in 1927, is located northwest of downtown Monrovia and has a capacity of 1,376 AF. The Santa Anita Wash leads from the Santa Anita Dam and is located along Monrovia’s western boundary. The Sawpit Debris Basin is located in the Monrovia foothills and has a capacity of 476 AF. The Sawpit Wash leads from the Sawpit Debris Basin and is located in east Monrovia. Both the Santa Anita Wash and Sawpit Wash generally flow in a southerly direction and converge at a point south of Live Oak Avenue outside of city limits. Both drainages are maintained by the Los Angeles County Flood Control District (LACFCD).

A seiche is typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other. When the wind stops, the water rebounds to the other side of the enclosed area. The water then continues to oscillate back and forth for hours or even days. Earthquakes, tsunamis, or severe storm fronts may also cause seiches. In the context of this Project area, a seiche could occur in the body of water behind Santa Anita Dam.

#### **13.1.2 Regulatory Setting**

This Section briefly summarizes the various Federal, State, regional, and local agencies’ regulations and policies related to protection of groundwater and surface water quality, and protection against flooding and other hydrologic hazards.





Source: PSOMAS 2018

Figure 13-1 Existing Surface Hydrology Map, Alexan Foothills Specific Plan Area

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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## **Federal**

### ***Clean Water Act***

The Federal Clean Water Act (1972) (CWA) is the primary Federal Law that protects the quality of the nation's surface waters, including lakes, rivers, aquifers, and coastal areas. The CWA focuses on the protection of surface water, but certain sections also apply to groundwater. Under the CWA, the U.S. Environmental Protection Agency (EPA) sets national standards and effluent limitations, and delegates many regulatory responsibilities to the California State Water Resources Control Board (SWRCB). The CWA established a permit system based on the concept that all discharges into the nation's waters are unlawful unless specifically authorized. The CWA contains several provisions to protect water quality, including Sections 303(c)(2)(B), 303(d), 401, 402(p), and 404, and the Toxics Rule. Section 303(d) of the CWA is discussed briefly below.

**National Pollution Discharge Elimination System (NPDES).** This is a program created for consistency with the CWA. The Act prohibits discharging "pollutants" through a "point source" into a "water of the United States" unless they have an NPDES permit. The permit contains limits on what can be discharged, creates monitoring and reporting requirements, and implements other provisions to ensure that the discharge does not diminish water quality and/or people's health.

**CWA Section 303(d).** Section 303(d) of the CWA requires that States develop a list of water bodies that do not meet water quality standards (i.e., impaired water bodies), establish priority rankings for waters on the list, and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. The list of impaired water bodies is revised periodically (typically every two years). Many entities provide data to the SWRCB to compile the 303(d) List and to develop TMDLs.

### ***National Flood Insurance Act***

FEMA is responsible for managing the National Flood Insurance Program (NFIP), which makes federally-backed flood insurance available for communities that agree to adopt and enforce floodplain management ordinances to reduce future flood damage.

The NFIP, established in 1968 under the National Flood Insurance Act, requires that participating communities adopt certain minimum floodplain management standards, including restrictions on new development in designated floodways, a requirement that new structures in the 100-year flood zone be elevated to or above the 100-year flood level (known as base flood elevation), and a requirement that subdivisions be designed to minimize exposure to flood hazards.

To facilitate identifying areas with flood potential, FEMA has developed Flood Insurance Rate Maps that can be used for planning purposes, including floodplain management, flood insurance, and enforcement of mandatory flood insurance purchase requirements. Los Angeles County is a participating jurisdiction in the NFIP and, therefore, all new development must comply with the minimum requirements of the NFIP.

## **State**

### ***Porter-Cologne Act***

Under the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), the SWRCB has authority over state water rights and water quality policy. Porter-Cologne also established nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level. RWQCBs engage in a number of water quality functions in their respective regions. One of the most important responsibilities is preparing and periodically updating the water quality control plans. Each Plan establishes:

- Beneficial uses of water designated for each water body to be protected;
- Water quality standards, known as water quality objectives, for both surface water and groundwater; and
- Actions necessary to maintain these standards in order to control non-point and point sources of pollution to the State's waters.

Permits issued to control pollution (i.e., waste discharge requirements) must implement Basin Plan requirements (i.e., water quality standards), taking into consideration beneficial uses to be protected. The RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. Any person proposing to discharge waste within any region must file a report of waste discharge with the appropriate RWQCB. No discharge may take place until the RWQCB issues waste discharge requirements or a waiver of the waste discharge requirements.

The State Water Resources Control Board and the nine RWQCBs protect water quality in the State of California. Monrovia is under the jurisdiction of the Los Angeles RWQCB (Region 4) (herein referred to as RWQCB).

### ***Title 22 of the California Code of Regulations***

California Code of Regulations Title 22, Division 4 establishes both maximum contaminant levels (MCLs) and secondary MCLs that shall not be exceeded in water supplied to the public. This section is equivalent to the federal Safe Drinking Water Act. Division 4.5 establishes standards for treatment, storage, and disposal facilities (TSDF) constructed, operated, or maintained within certain distances of fault lines, floodplains, or the maximum high tide and standards for establishing groundwater and underground water above the water table zone protection.

### ***California Water Code 10912***

Section 10912 of the Water Code requires a city or county that determines that a project, as defined, is subject to CEQA to identify any public water system that may supply water for the project and to request those public water systems to prepare a specified water supply assessment.

## Local

### ***Municipal Regional Stormwater NPDES Permit***

On November 8, 2012, the RWQCB adopted Order R4-2012-0175 (Waste Discharge Requirements for Municipal Separate Storm Sewer System) (MS4) Discharges within Coastal Watersheds of Los Angeles County (MS4 Permit). Order R4-2012-0175 became effective on December 28, 2013 and serves as the NPDES permit for stormwater and non-stormwater discharges originating from the Los Angeles County Region. The permit covers the land areas in the Los Angeles County Flood Control jurisdiction, unincorporated areas of Los Angeles County, and 84 cities within the County of Los Angeles. The City of Monrovia is included in the MS4 Permit as a permittee under Order R4-2012-0175. The City of Monrovia is a member of the Los Angeles County Storm Water Program, which regulates and controls storm water and urban runoff into the Los Angeles River, San Gabriel River, tributaries to these rivers, and ultimately the Pacific Ocean.

The MS4 permit prohibits future projects from causing an increase in the volume or rate of stormwater runoff from a project site (i.e., prohibits hydromodification of a project site), and requires treatment of runoff from a project site. To accomplish this, the RWQCB and Los Angeles County encourage the use of Low Impact Development (LID) technology to infiltrate and treat stormwater runoff during operation of new projects (i.e., through bioswales, use of pervious pavers etc.). In order to comply with the current MS4 Permit, a “Low Impact Development (LID) Standards Manual” was developed by the County (2014) that details actions for compliance with the MS4 Permit.

## **13.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts on hydrology and water quality that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for the proposed ZCA Areas A and C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **13.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: X (a) through (j), implementation of the Project would have a significant impact related to hydrology and water quality if it would:

- (a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality;
- (b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- (c) Substantially alter the existing drainage pattern of the project area or vicinity, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - i) result in substantial erosion or siltation in or outside the project area;

- ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
  - iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of additional runoff; or
  - iv) impede or redirect flood flows.
- (d) Result in a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- (e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impacts on groundwater are discussed in EIR Chapter 20 (Utilities and Service Systems).

### **13.2.2 Analysis Methodology**

The methodology for evaluating potential environmental impacts related to hydrology and water quality followed this basic sequence:

- (1) Background reports were evaluated to identify existing environmental conditions and issues related to hydrology and water quality, including the regulatory framework that applies to these issues.
- (2) The CEQA Statute and Guidelines were consulted to identify environmental impact topics and issues that should be addressed in the EIR.
- (3) The Project was analyzed to determine if any significant impacts to hydrology and water quality would occur.
- (4) For potential environmental impacts, mitigation measures were designed to avoid or reduce any significant impact to a less than significant level, where possible.

### **13.2.3 Environmental Impacts**

#### **IMPACT HYD-1 SURFACE HYDROLOGY AND WATER QUALITY**

#### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

This discussion evaluates the potential of the Project to:

- Violate any water quality standards or waste discharge requirements;
- Conflict with a water quality control plan;

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- 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
- Otherwise substantially degrade water quality.

The majority of the Project area is currently developed with hardscape and structures, including both the Alexan Foothills Specific Plan area as well as ZCA Areas A and C. However, buildout of the Project area has the potential to increase the amount of impervious surfaces, which would cause an increase in the volume and rate of stormwater runoff and potentially result in degradation of water quality in offsite water bodies. Future buildout of the Project would be subject to MS4 Permit requirements and Standard Condition SC HYD-1 would ensure that future development does not result in hydromodification of the area. Therefore, with implementation of Standard Condition SC HYD-1 would ensure that operational impacts on water quality under buildout of the full Project would be less than significant.

In addition, preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) would be required for construction of developments greater than one acre pursuant to an NPDES Permit for Construction Activities. With implementation of Best Management Practices (BMPs) and other measures that would be required through this process, water quality impacts associated with construction activities in the Project area would also be less than significant.

### **Alexan Foothills Specific Plan**

A Hydrology and LID report was completed for the Alexan Foothills Specific Plan (PSOMAS 2018) to document compliance with SC HYD-1. The proposed site plan for the Alexan Foothills Specific Plan was divided into three drainage areas (PSOMAS 2018): the northwest and southwest areas, and a northeast area. The northwest area drains to an existing street catch basin in S. Evergreen Avenue. The northeast area drains to a street catch basin in S. Magnolia Avenue. The southwest area drains to an existing 10-foot wide open drainage channel owned and operated by the City of Monrovia.

In the Alexan Foothills Specific Plan area, the applicant intends to manage stormwater runoff from the Specific Plan area through installation of several dry wells. Figures 13-2 and 13-3 depict post-development hydrology conditions as well as proposed LID improvements and stormwater Best Management Practices (BMPs). The Hydrology and LID report concludes that these dry wells would adequately capture and treat runoff generated by buildout of the Alexan Foothills Specific Plan. The report concludes that post-development conditions would decrease the amount of runoff from current conditions with the inclusion of the proposed infiltration dry wells. Table 13-2 depicts post-development conditions and Table 13-3 compares them against pre-development conditions in the Alexan Foothills Specific Plan area. Table 13-4 depicts performance of the



proposed dry wells. Therefore, the Alexan Foothills Specific Plan would result in less than significant impacts on water quality during operation of the Alexan Foothills Specific Plan.

**Table 13-2 Post-Development of Alexan Foothills Specific Plan in a 50-Year Storm Frequency**

Drainage Subarea	Area (acres)	Imperviousness	Q <sub>50</sub> (cfs)	V <sub>50</sub> (acre-feet)
Northwest	1.71	90%	4.1	0.42
Northeast	3.58	90%	6.9	1.08
Southwest	1.43	90%	3.6	0.42
<b>Total</b>	<b>6.72</b>	<b>90%</b>	<b>14.6</b>	

Source: Psomas 2018 (see Appendix H)

**Table 13-3 Comparison of Specific Plan Pre- and Post-Development Conditions in a 50-Year Storm Frequency**

Drainage Subarea	Area (acres)	Q <sub>50</sub> (cfs)
Pre-developed conditions	6.72	20.7
Post-developed conditions	6.72	15.3
<b>Difference</b>	<b>0</b>	<b>- 5.4</b>

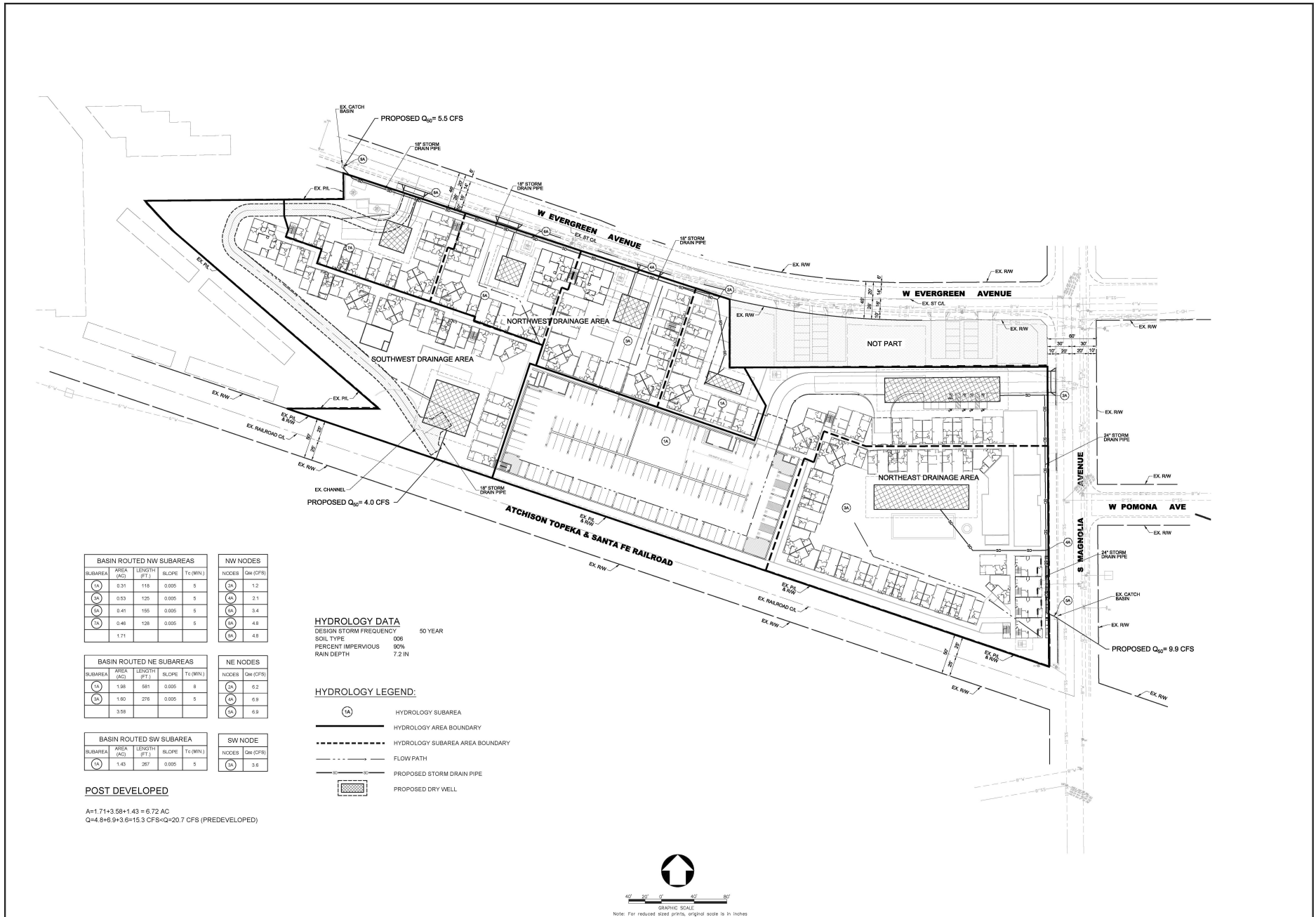
Source: Psomas 2018 (see Appendix H)

**Table 13-4 Specific Plan Water Quality Volume / Dry Well Area Calculations**

Drainage Subarea	Area (acres)	Water Quality Volume (cubic feet)	dmax (feet) <sup>(A)</sup>	Area Required (square feet)	Area Required (square feet)
1A	0.46	1,495	3.84	974	1,024
2A	0.41	1,332	3.84	868	900
3A	0.53	1,772	3.84	1,122	1,156
4A	0.31	1,008	3.84	657	676
5A	1.98	6,430	3.84	4,186	4,225
6A	1.60	5,196	3.84	3,383	3,480
7A	1.43	4,644	3.84	3,023	3,025
<b>Total Site</b>	<b>6.72</b>	<b>21,827</b>		<b>14,213</b>	<b>14,487</b>

Source: Psomas 2018 (see Appendix H)

Notes:  
 (A) Bottom of dry well is set at 15 feet below ground. It is subject to change per recommendations of soils engineer.



BASIN ROUTED NW SUBAREAS					NW NODES	
SUBAREA	AREA (AC)	LENGTH (FT)	SLOPE	T <sub>c</sub> (MIN)	NODES	Q <sub>10</sub> (CFS)
(A)	0.31	118	0.005	5	(A)	1.2
(B)	0.53	125	0.005	5	(B)	2.1
(C)	0.41	155	0.005	5	(C)	3.4
(D)	0.46	128	0.005	5	(D)	4.6
	1.71				(E)	4.8

BASIN ROUTED NE SUBAREAS					NE NODES	
SUBAREA	AREA (AC)	LENGTH (FT)	SLOPE	T <sub>c</sub> (MIN)	NODES	Q <sub>10</sub> (CFS)
(A)	1.98	581	0.005	8	(A)	6.2
(B)	1.90	276	0.005	9	(B)	6.9
	3.58				(C)	6.9

BASIN ROUTED SW SUBAREA					SW NODE	
SUBAREA	AREA (AC)	LENGTH (FT)	SLOPE	T <sub>c</sub> (MIN)	NODES	Q <sub>10</sub> (CFS)
(A)	1.43	387	0.005	5	(A)	3.8

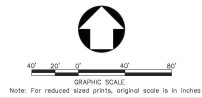
**POST DEVELOPED**

A=1.71+3.58+1.43 = 6.72 AC  
 Q=4.8+6.9+3.8=15.3 CFS-Q=20.7 CFS (PREDEVELOPED)

**HYDROLOGY DATA**  
 DESIGN STORM FREQUENCY 50 YEAR  
 SOIL TYPE 006  
 PERCENT IMPERVIOUS 90%  
 RAIN DEPTH 7.2 IN

**HYDROLOGY LEGEND:**

- (A) HYDROLOGY SUBAREA
- HYDROLOGY AREA BOUNDARY
- - - - - HYDROLOGY SUBAREA AREA BOUNDARY
- FLOW PATH
- PROPOSED STORM DRAIN PIPE
- PROPOSED DRY WELL

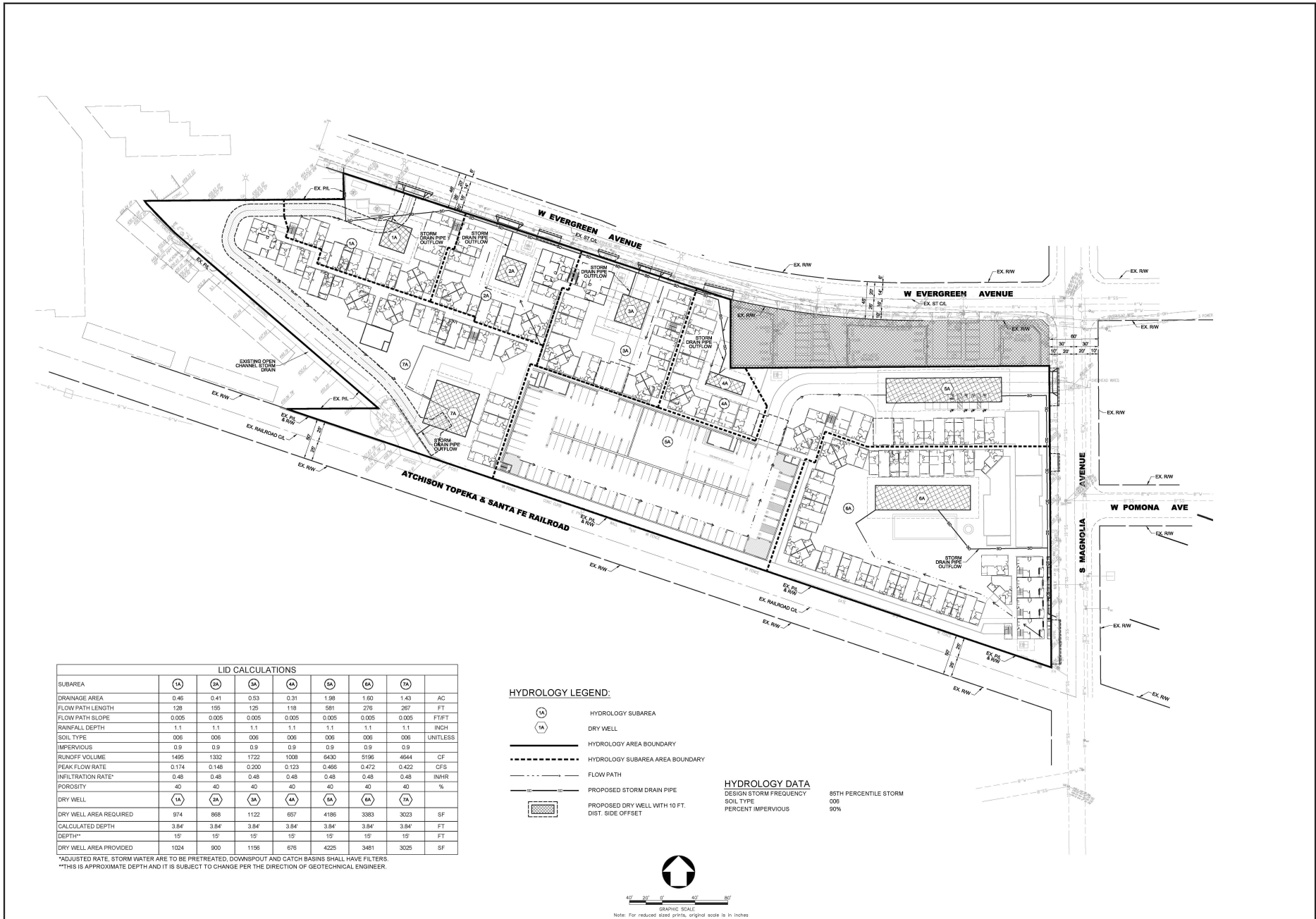


Source: PSOMAS 2018

**Figure 13-2 Post-Development Hydrology Map, Alexan Foothills Specific Plan**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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Source: PSOMAS 2018

**Figure 13-3 Preliminary LID/BMP Hydrology Map, Alexan Foothills Specific Plan**

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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## ZCA Areas A and C

As required in Standard Condition SC HYD-1, Finally, future buildout of remaining GP/ZCA areas would also be subject to the same requirements under the MS4 Permit as well as NPDES Permits for Construction Activities. Preparation of a Hydrology and LID report would be required for future development in those areas to document that the development would not result in hydromodification of the area. Approval of the drainage plans would be required prior to issuance of building permits. Therefore, operational and construction impacts on water quality for future development in ZCA Areas A and C would be less than significant.

## Standard Conditions

Standard Condition SC HYD-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**SC HYD-1:** Based upon the requirements of the City's Stormwater Management Ordinance, MMC 12.36 and the Los Angeles County Municipal Storm Water National Pollutant Discharge Elimination System (MS4 NPDES) Permit issued by California Regional Water Quality Control Board, Los Angeles Region, the following shall be incorporated into development applications:

- Minimize impacts from storm water runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under the California Environmental Quality Act (California Public Resources Code Section 21100), Section 13369 of the California Water Code, Sections 319, 402(p), and 404 of the Clean Water Act, Section 6217(g) of the Coastal Zone Act Reauthorization Amendments, Section 7 of the Environmental Protection Act, and local governmental ordinances.
- Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground.
- Minimize the amount of storm water directed to impermeable surfaces.
- Minimize pollution emanating from parking lots through the use of appropriate treatment control using best management and good housekeeping practices.
- The applicant shall integrate Best Management Practices to ensure compliance with NPDES guidelines and the City's Stormwater Management Ordinance, MMC 12.36 to the satisfaction of the City Engineer, prior to the issuance of the grading permit. The design, implementation, construction activities and maintenance of the management devices shall mitigate and reduce pollutants in storm water discharges to the maximum extent practicable and shall be identified as on a "site specific mitigation plan." Site Specific Mitigation Plan must specifically address and provide best management practices (BMPs) either structural or non-structural to mitigate pollutants.
- The applicant or any successor in interest shall conduct annual maintenance inspections by the manufacturer or by a City approved inspector of all structural and/or treatment control storm water devices by following best management practices which shall also verify the legibility of all required stencils and signs which shall be repainted and labeled as necessary. Proof of such inspection shall be retained by the applicant or any successor in interest and a copy submitted to the City of Monrovia on a yearly basis.

## Mitigation Measures

No mitigation measures are required.

## **IMPACT HYD-2 FLOODING AND OTHER HYDROLOGIC HAZARDS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

This discussion evaluates the potential of the Project to:

- Substantially alter the existing drainage patterns so as to impede or redirect flood flows;  
or
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation

The Project area is not located within a 100-year flood hazard area. The Project area is, however, located within the inundation areas for the 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 of the Project area. 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. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Therefore, the potential for dam failure is considered low. Also, evacuation plans have been developed in dam inundation areas by the County of Los Angeles Office of Emergency Management in emergency response plans. Therefore, impacts on safety as a result of a dam failure are also considered low. Impacts would be less than significant.

As the Project area is not adjacent to the water body behind the Santa Anita Dam, there would be no risk of direct impacts from a seiche on this water body.

### **Mitigation Measures**

No mitigation measures are required.

### **13.2.4 Impact Conclusions**

Compliance with the requirements of the MS4 Permit and NPDES Permits for Construction Activities would ensure that the Project would result in less than significant impacts on water quality. The Project would have less than significant impacts on flooding potential as well. No mitigation is required.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AF	acre-feet
BMP	Best Management Practice
CEQA	California Environmental Quality Act
cfs	cubic feet per second



<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
CWA	Clean Water Act
dmax	Maximum depth of the facility
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
gpm	gallons per minute
GPA	General Plan Amendment
LACFCD	Los Angeles County Flood Control District
LID	Low Impact Development
MCL	maximum contaminant levels
MS4	Municipal Separate Storm Sewer System
NFIP	National Flood Insurance Program
NPDES	National Pollutant Discharge Elimination System
PD	Planned Development
RWQCB	Regional Water Quality Control Board
Q <sub>50</sub>	Flow rate under a 50-year event
SWRCB	State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TMDL	Total Maximum Daily Load
TSDF	treatment, storage, and disposal facilities
V <sub>50</sub>	Flow volume under a 50-year event
WSA	Water Supply Assessment
ZCA	Zoning Code Amendment

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## **14. LAND USE AND PLANNING**

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This EIR Chapter describes existing land use and planning in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

### **14.1 SETTING**

The environmental and regulatory setting with respect to land use and planning is described generally within the City, as well as specifically at the Project area and its surroundings. The City's land use and zoning designation maps (City of Monrovia 2018 and 2010, respectively), along with the City's Land Use Element (City of Monrovia 2018), are used to describe these local conditions.

#### **14.1.1 Environmental Setting**

The City of Monrovia is approximately 14 square miles (8,960 acres) in size. The City is bounded by the City of Arcadia to the west, Los Angeles National Forest to the north, the Cities of Bradbury and Duarte to the east, and unincorporated Los Angeles County and the City of Irwindale to the south. As one of the older incorporated cities in Los Angeles County, Monrovia has very little undeveloped vacant land. Monrovia is largely a residential community that experienced most of its residential growth in the 1960s. Some vacant land exists in the hillside areas. However, Monrovia residents voted overwhelmingly in July 2000 to preserve open space and tax themselves to help buy hillside land from private owners to prevent further residential development.

The Project area comprises one City block and approximately 9.63 acres. The block is bounded by West Evergreen Avenue to the north, South Magnolia Avenue to the east, South Mayflower Avenue to the west, and the METRO Gold Line light rail to the south.

The Project area is designated as Manufacturing under the City's Land Use Element. This allows for light manufacturing and limited heavy manufacturing uses. Additionally, under the current zoning, the entire Project area is designated as Manufacturing. Industrial uses are permitted in this zone, either by right or subject to a conditional use permit. Various commercial uses are also allowed under this zoning as well institutional uses, with the exception of cemeteries and government buildings. Under this zone, mobile home parks are the only residential uses allowed and require a conditional use permit. The current land uses within the Project area include a mix of light industrial, warehouse/storage, office, a church, single family residential, private surface parking, and two cellular towers.

The Project area is surrounded by a variety of land uses (Table 14-1). Single and multi-family residential land uses exist to the south and west of the Project area. The I-210 Freeway lies to the north of the Project area. The Station Square Transit Village lies east of the Project area across Magnolia Avenue. Specific land uses allowed within the Station Square Transit Village planning area include residential, commercial, office, light manufacturing, hospitality, open space, and parking. Older single-family residential and industrial land uses currently exist north of Pomona Avenue but are proposed for multi-family residential uses. Multi-family land uses,

known as the MODA Apartments at Station Square, lie south of Pomona Avenue and north of the railroad tracks. Station Square South lies south of the railroad tracks at the northeast corner of South Magnolia and West Duarte Road. This area is currently developed with older industrial uses, but a Specific Plan is approved for development of a transit-oriented development consisting of 296 residential units, including 6-live work units, public open space, a publicly accessible driveway and drop-off area for the adjacent METRO Gold Line Station in a portion of Peck Road, and parking.

**Table 14-1: Surrounding Zoning and Land Use Designations**

<b>Direction</b>	<b>Zoning</b>	<b>Land Use</b>
Project Area	Manufacturing	Manufacturing
North	I-210 Freeway	I-210 Freeway
South	Residential – High Density (across railroad tracks)	Residential – High Density (across railroad tracks)
East	Planned Development – 12 (Station Square Transit Village)	Planned Development
West	Residential - Medium Density - 2500	Residential – Medium

### **14.1.2 Regulatory Setting**

#### **Federal**

There are no applicable federal regulations for this issue area.

#### **State**

##### ***General Plan Law (California Government Code Section 65300)***

California Government Code Section 65300 regulates the substantive and topical requirements of General Plans. State Law requires each city and county to adopt a General Plan “for the physical development of the County or City, and any land outside its boundaries which bears relation to its planning.” The California Supreme Court has called the General Plan the “constitution for future development.” The General Plan expresses the community’s development goals and embodies public policy relative to the distribution of future land uses, both public and private.

Since the General Plan affects the welfare of current and future generations, State Law requires that the plan take a long-term perspective (typically 15 to 25 years). The General Plan projects conditions and needs into the future and establishes long-term policy for day-to-day decision-making.

Policies of the General Plan are intended to guide most land use decisions. Pursuant to State Law, subdivisions, capital improvements, development agreements, and many other land use actions must be consistent with the adopted General Plan. In counties and general Law cities, zoning regulations and Specific Plans are required to conform to the General Plan. In addition, by preparing, adopting, implementing, and maintaining the General Plan, a city or county puts in place a policy framework that:

- Serves to identify the community’s land use, circulation, environmental, economic and social goals and policies as they relate to land use and development;

- Provides a basis for local government decision-making, including decisions on development approvals and exactions;
- Provides residents and other community members with opportunities to participate in the planning and decision-making processes of their communities; and
- Informs residents, developers, decision-makers and other cities and counties of the ground rules that guide development within a particular community.

State Law requires General Plans to address seven mandatory Elements (or topics): Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Jurisdictions may also adopt additional Elements that cover topics outside the seven mandated Elements (such as economic development and historic preservation). In addition to including mandatory Elements, a General Plan must be internally consistent; as described by State Law, policy conflicts cannot exist, either textual or diagrammatic, between the components of a General Plan. Different policies must be balanced and reconciled within the plan. The internal consistency requirement has five dimensions:

- **Equal Status among Elements.** All Elements of the General Plan have equal legal status.
- **Consistency between Elements.** All Elements of a General Plan, whether mandatory or optional, must be consistent with one another.
- **Consistency within Elements.** Each Element's data, analyses, goals, policies and implementation programs must be consistent with, and complement, one another.
- **Area Plan Consistency.** All principles, goals, objectives, policies, and plan proposals set forth in an Area or Community Plan must be consistent with the overall General Plan.
- **Text and Diagram Consistency.** The General Plan's text and its accompanying diagrams are integral parts of the plan. They must be in agreement.

### ***General Plan Guidelines (California Government Code Section 65301)***

Section 65301 of the California Government Code requires a General Plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may utilize judgment in determining what areas outside of its boundaries to include in the planning area. The State of California General Plan Guidelines state that the Planning Area for a City should include (at minimum) all land within the City limits and all land within the City's sphere of influence.

### ***Specific Plan Law (California Government Code Section 65451)***

California Government Code Section 65451 regulates the substantive and topical requirements of Specific Plans. A Specific Plan is a tool for the systematic implementation of the General Plan and, similar to zoning regulations, it establishes a link between implementing policies of the General Plan and individual development proposals. A Specific Plan differs from zoning in that it applies to a defined geographic area and has tailored development regulations. A Specific Plan may be as general as setting forth broad policy concepts, or as detailed as providing direction

on every facet of development, from the type, location, and intensity of uses to the design and capacity of infrastructure. The City has utilized the Specific Plan process for projects that have produced affordable units, reduced setbacks and parking standards, and increased densities.

## **Regional**

### ***Regional Comprehensive Plan and Guide***

The Southern California Association of Governments (SCAG) assists cities, counties, and other agencies by reviewing local government plans and individual projects for consistency with the regional plans, including the Regional Comprehensive Plan and Guide, the Regional Mobility Element/Regional Transportation Plan (RTP), the Growth Management Plan, and the federally mandated Air Quality Management Plan. This program provides a framework to coordinate local and regional decisions regarding future growth forecasts at intervals ranging from three to five years. The adopted growth forecasts become the basis for SCAG's functional plans (transportation, housing, air, and water) for the region. The population totals and growth distribution are used to plan the future capacity of highways and transit systems, quantity and location of housing, water supply, and siting and sizing of sewage treatment systems.

Monrovia is one of 30 members of the San Gabriel Valley Council of Governments (SGVCOG), a subregion of SCAG, made up of the 30 cities in the San Gabriel Valley. SGVCOG's mission is to "ensure our Valley's 'fair share' of scarce federal, State, and local resources by fostering consensus among cities in the San Gabriel Valley regarding policies and programs that address issues relating to land use, air quality, transportation, solid waste and other matters deemed essential to our cities." SGVCOG's current priorities ensure that SCAG's RTP updates and METRO's Long Range Plan updates include SGVCOG's adopted high priority projects.

The Growth Management Chapter of the Regional Comprehensive Plan and Guide contains goals designed to improve the regional standard of living, regional quality of life, and provide social, political, and cultural equity.

The Project area qualifies as a "Transit Priority Area (TPA)" as defined in Section 21099(a)(7) of CEQA, as well as a "High Quality Transit Area" (HQTA) defined by SCAG in their 2016-2040 RTP/SCS (SCAG 2016). TPAs and HQTAs are defined as areas within one-half mile of a major transit stop that are existing or planned where a "major transit stop" is a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods" (Section 21064.3 of CEQA).

TPAs and HQTAs are areas where people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life (SCAG 2016). High density development in TPAs and HQTAs result in increased ridership on important public transit and result in increased pedestrian and bike infrastructure. Housing near transit helps to increase connectivity to employment opportunities and reduce reliance on automobile ownership. HQTAs account for only three percent of total land area in SCAG region and two percent of the developable land in the region (SCAG 2016). However, these areas are planned and projected to accommodate 46 percent of the region's future household growth and 55 percent of the future employment growth (SCAG 2016).

## **Local**

### ***City of Monrovia General Plan***

The Land Use Element establishes land use policy and land use patterns that will govern growth in Monrovia until 2030. The Land Use Element promotes new development opportunities at key locations while ensuring compatibility with established neighborhoods. The objectives of this Element include:

- 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.

### ***City of Monrovia Subdivision and Zoning Ordinances***

The Subdivisions and Zoning Ordinances, Titles 16 and 17 of the City's Municipal Code, provide additional development and performance standards for development of land uses and related activities in Monrovia. The Zoning Ordinance serves as the primary implementation tool for the Land Use Element and the goals and policies it contains. A Zoning Map, consistent with the General Plan Land Use Policy Map, has been adopted to identify the zoning categories applied to each parcel of land within Monrovia. Together, the Zoning Ordinance and Map are used to identify the specific types of use, intensity, and development standards applicable to given parcels or areas of land.

## **14.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to land use and planning that could result from the Project. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.



### **14.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: XI (a) through (b), implementation of the Project would have a significant impact related to land use and planning if it would:

- (a) Physically divide an established community; or
- (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.

### **14.2.2 Analysis Methodology**

The methodology for evaluating potential environmental impacts related to land use and planning followed this basic sequence:

- (1) City and other applicable planning documents were reviewed to identify existing environmental conditions and issues related to land use and planning, including the regulatory framework that applies to these issues.
- (2) The CEQA Statute and Guidelines, including Appendix G (Environmental Checklist Form), were consulted to identify environmental impact topics and issues that should be addressed.
- (3) The Project was qualitatively assessed to determine whether any significant impacts to land use and planning would occur. If the Project was determined to conflict with a relevant plan, a determination was then made as to whether the conflict or inconsistency would result in a significant physical environmental impact that would otherwise be mitigated or avoided without implementation of the Project.
- (4) For potential environmental impacts, mitigation measures were designed to avoid or reduce each impact to a less than significant level, where possible.

### **14.2.3 Environmental Impacts**

The Project includes the following components: General Plan Amendment, Zoning Code Amendment, and the Alexan Foothills Specific Plan. Each component is summarized below, and is described separately in more detail in Sections 3.6, 3.7, and 3.8, respectively.

#### **General Plan Amendment**

The entire 9.63-acre Project area is proposed for a General Plan Amendment from Manufacturing to Planned Development Area (PD-27: Station Square West) at 54 dwelling units/acre (du/ac). As such, the General Plan Amendment would not physically divide an established community.

#### **Zoning Code Amendment**

The Zoning Code Amendment would establish a Planned Development Area (PD-27: Station Square West [PD-27]) for the entire 9.63-acre Project area in order to be consistent with the

General Plan Amendment. The Zoning Code Amendment (ZCA) includes Areas A and C (2.86 acres), Area B (6.77 acres).

### **Alexan Foothills Specific Plan**

Trammell Crow Residential proposes to implement the Alexan Foothills Specific Plan, which would establish the zoning for the 6.77-acre site located at 1625 South Magnolia Avenue, Monrovia, California. The Specific Plan area would be located within ZCA Area B.

### **IMPACT LUP-1 PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY**

The Project area is surrounded by a variety of land uses including the Station Square Transit Village to the east, Interstate-210 to the north, medium density residential land uses to the west, and high density residential land uses to the south (south of the METRO Gold Line light rail tracks). The current land uses within the Project area include a mix of light industrial, warehouse/storage, office, a church, single family residential, private surface parking, and two cellular towers.

### **General Plan Amendment**

The entire 9.63-acre Project area is proposed for a General Plan Amendment from Manufacturing to Planned Development Area (PD-27: Station Square West) at 54 dwelling units/acre (du/ac). As such, the General Plan Amendment would not physically divide an established community and impacts would be less than significant.

### **Zoning Code Amendment**

The Zoning Code Amendment would establish a Planned Development Area (PD-27: Station Square West [PD-27]) for the entire 9.63-acre Project area in order to be consistent with the General Plan Amendment.

### **ZCA Areas A and C**

A zone change for 2.86 acres is proposed from Manufacturing to a Planned Development Area to include high density residential development as well as other uses identified in PD-27 for Areas A and C (ZCA Areas A and C). Existing uses would be allowed to continue as legal conforming uses in ZCA Areas A and C. However, high density residential development would now be allowed these areas. The addition of high density residential development would increase compatibility of the area with adjacent proposed residential uses. Therefore, future development of ZCA Areas A and C would not physically divide an established community and impacts would be less than significant.

### **Alexan Foothills Specific Plan**

The Alexan Foothills Specific Plan is within ZCA Area B. Three light industrial structures, one residential unit, a church, and a commercial office building would be removed to make way for development of the 6.77-acre Alexan Foothills Specific Plan, which comprises a 436-unit apartment complex and parking structure. The purpose of the Alexan Foothills Specific Plan is to enhance the established community by establishing higher density residential units near public transportation. Two major goals of the Alexan Foothills Specific Plan are to upgrade the

existing physical conditions of the site to a more compatible urban form with the surrounding residential neighborhood, and to accommodate sustainable site and architectural design. The Alexan Foothills Specific Plan is designed to introduce additional residential units to the area, which would be more compatible with residential areas on all sides of the Project area than the existing primarily industrial uses. Furthermore, the Specific Plan does not propose the construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. Therefore, the Alexan Foothills Specific Plan would not physically divide an established community and impacts would be less than significant..

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT LUP-2 CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

#### ***Consistency with the City's General Plan and Zoning***

The Project area currently has a Manufacturing General Plan land use designation and zone category. The GPA and ZCA would authorize development of high-density residential land uses within ZCA Areas A, B, and C.

The Alexan Foothills Specific Plan (ZCA Area B) would provide a vision for the area, a development plan that addresses mobility, open space, and sustainability, and would include specific land use and development standards as well as design guidelines. Major goals of the Specific Plan are to increase housing stock in Monrovia, to provide live/work opportunities, to upgrade the existing physical conditions of the site to a more compatible urban form with the surrounding residential neighborhood, and to accommodate sustainable site and architectural design.

ZCA Areas A and C would allow for additional high density residential development near transit, which helps the City accomplish many of the goals of the Housing Element, Circulation Element, and Land Use Element as discussed further below. Existing uses would be allowed to continue as legal conforming uses under the GPA and ZCA.

Table 14-2 presents an evaluation of the Project's consistency with the General Plan including the Land Use, Housing, Circulation, Noise, Safety, Open Space, and Conservation Elements. The table lists the goals and policies relevant to the Project and provides a summary of how the Project is consistent.

**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
<b>Land Use Element</b>	
<p><b>Goal 1: Provide for a mix of land uses which provides a balanced community.</b>                      Policy 1.4 (P 1.4) Encourage the location of new high density residential development in close proximity (i.e., within walking distance) of the downtown, other major retail commercial areas, and/or transit facilities.                      G 1, P 1.2: Allow the development of mixed use projects consisting of residential, retail, and office along existing and future transit corridors such as Myrtle Avenue and the Station Square Planning Area.                      G 1, P 1.8: Develop higher density residential area in close proximity to employment centers.</p>	<p><b>Consistent.</b> New Planned Development (PD)-27 allows for high density residential development near a METRO Gold Line Light Rail Station which runs to employment centers throughout the City and the region. Specific Provisions of PD-27 also incentivize new commercial development near the METRO station, including transit-serving commercial uses. The Alexan Foothills Specific Plan contains four live/work units as well.</p>
<p><b>Goal 2: Provide adequate infrastructure for all development.</b>                      G 2, P 2.1: Ensure that land use intensities are consistent with the capacities of existing and planned infrastructure and public services.</p>	<p><b>Consistent.</b> The Project is being built in an urbanized area comprised of older industrial/manufacturing buildings which already supports urban infrastructure. Minor improvements to area intersections and water supply infrastructure would be required for the proposed Alexan Specific Plan, and no major infrastructure improvements are anticipated for future buildout of the ZCA Areas A and C.</p>
<p><b>Goal 4: Promote land use patterns and development which contribute to community and neighborhood identity.</b>                      G 4, P 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.</p>	<p><b>Consistent.</b> The Specific Plan contains development standards and design objectives to ensure that the proposed multi-family development is designed to be compatible with the land uses approved for the Station Square Transit Village area as well as adjacent residential development. Buildout of the Alexan Foothills Specific Plan and ZCA Areas and C would be subject to design review by the City, ensuring that new development is compatible with the neighborhood (see Chapter 5, Aesthetics and Visual Resources).</p>
<p><b>Goal 6: Reduce the impact of noise on residential uses.</b>                      G 6, P 6.1: Residences constructed near the Foothill Freeway (I-210) or near the railroad tracks shall be designed to reduce the intrusion of sound into the dwelling.</p>	<p><b>Consistent.</b> Mitigation measure MM NOI-1 requires implementation of design features along units facing the I-210 and railroad tracks to ensure that interior and exterior noise standards by the City and State are met and confirmed through required acoustical analysis for all proposed developments in the PD-27 area.</p>
<p><b>Goal 12: Expand recreational and park use opportunities.</b>                      G 12, P 12.2: Maintain or increase multiple-family residential recreation space development standards as a supplement to park space.</p>	<p><b>Consistent.</b> The Alexan Foothills Specific Plan is a multi-family residential development that includes onsite recreational amenities including two swimming pools, a fitness room, a bicycle repair shop, and many plazas for use by residents. Any proposed high density residential development in the ZCA Areas A and C would also be subject to review and approval as well, where incorporation of open space for residents would also be required.</p>

**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
<b>Housing Element</b>	
<p><b>Goal 2: Provide adequate housing site to facilitate the provision of a range of housing types to meet community needs.</b>                      G 2, P 2.1. 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.                      G 2, P 2.2. Encourage and facilitate the development of mixed use and high density residential development in specified areas (e.g. Station Square, Old Town Extension).</p>	<p><b>Consistent.</b> The Project would introduce high density residential development that is near the METRO Gold Line Light Rail Station near Station Square Transit Village area. Multi-family housing would be developed under the Alexan Foothills Specific Additional high-density residential development would be allowed in ZCA Areas A and C. Thus, the Project would increase the overall diversity and number of housing units in the area.</p>
<p><b>Goal 6: Promote a healthy and sustainable Monrovia through support of existing and new housing which minimizes reliance on natural resources and automobile use.</b>                      G 6, P 6.5: Incorporate transit and other transportation alternatives including walking and bicycling into the design of new development, particularly in areas within a half mile of designated transit stops.</p>	<p><b>Consistent.</b> The Alexan Foothills Specific Plan development would replace one single family residence with 436 apartments. An additional 82 residential units are possible in ZCA Areas A and C. The Project is in very close proximity to the METRO Gold Line Light Rail Station, and public parking for the METRO station would be included in the Alexan Foothills Specific Plan. Finally, pedestrian walkways and bicycle parking are provided in the Alexan Foothills Specific Plan.</p>
<b>Circulation Element</b>	
<p><b>Goal 1: Minimize traffic congestion on arterial and collector streets during peak hours in order to ensure a safe and efficient movement of people and goods within the City.</b>                      G 1, P 1:1: Regulate the intensity of land use to keep traffic on any arterial in balance with roadway capacity.                      G 1, P 1:2: Limit direct private property access to arterials, where dual access is possible, to minimize interference with through traffic.                      G 1, P 1:5: Implement traffic signal coordination on City arterial streets to the maximum extent practical, and integrate signal coordination efforts with those of adjacent jurisdictions.                      G 1, P 1:6: Develop and implement intersection capacity improvements where feasible and justified by existing or projected traffic demands. Opportunities to improve intersection operations throughout the City are expected to arise as future development occurs, including the area around the planned light rail station.                      G 1, P 1:7: Design and employ traffic control measures, including signalization, limiting access, limiting on-street parking during peak periods, constructing turn lanes, and modifying lane striping and signage to ensure City streets and roads function as needed. One specific location identified for potential re-striping</p>	<p><b>Consistent.</b> The Project provides pedestrian-oriented development adjacent to a transit station and within easy walking distance to commercial areas in Monrovia. Public parking for the METRO station would be included in the Alexan Foothills Specific Plan. Finally, pedestrian walkways and bicycle parking are provided in the Alexan Foothills Specific Plan, and would be required for future development within ZCA Areas A and C.</p>

**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
<p>improvements is the eastbound segment of Huntington Drive beneath the I-210 freeway, where the roadway narrows from three through lanes to two.</p> <p>G 1, P 1:9: Improve intersection and street sections wherever possible to maintain an acceptable level of service for peak traffic flows. With the recognition that the City is largely built out and that major physical improvements to the circulation system will be limited to certain areas, establish level of service (LOS) D as the minimum standard to be maintained, except at locations where LOS F conditions currently exist. When reviewing impacts at locations where existing development constrains the ability to widen or otherwise improve roadways to achieve the desired LOS, consider improvements to pedestrian and transit facilities as acceptable traffic mitigation measures. The City has determined that a project would have a significant traffic impact under California Environmental Quality Act (CEQA) at an intersection if the conditions in Table II-1 were found. For the purpose of applying these significance criteria, the V/C ratio shall be reported using the Intersection Capacity Utilization (ICU) methodology. LOS at two-way stop-controlled intersections shall be based on the Highway Capacity Manual (HCM) methodology and the incremental change in volume-to-capacity (V/C) ratio calculated by analyzing such intersections with the ICU methodology assuming a two-phase signal.</p> <p>G 1, P 1:10: For daily traffic, the desired levels of service differ according to the functional classification of the street: LOS D on primary arterials (V/C &lt; 0.90), mid-D on secondary arterials (V/C &lt; 0.85), LOS C on collector streets (V/C &lt; 0.80) and LOS A on local streets (V/C &lt; 0.60). The City has determined that a project would have a significant traffic impact under CEQA on a street if the conditions in Table II-2 are met.</p> <p>G 1, P 1:12: Promote ridesharing through publicity and provision of information to the public.</p>	
<p><b>GOAL 2: Provide a system of streets and alleys that meets the needs of current and future residents, local and commuter traffic demands and ensures the safe and efficient movement of vehicles, people and goods throughout the City. Improve streets and alleys to their full design standards</b></p>	<p><b>Consistent.</b> Implementation of mitigation measures MM T-1 and MM T-2 under the Alexan Foothills Specific Plan would ensure that area intersections operate at a sufficient Level of Service to enable safe and efficient movement of people and goods through the area after buildout of the Specific Plan. Future buildout in ZCA Areas</p>

**Table 14-2: Consistency with General Plan Goals and Policies**

<b>General Plan Goals and Policies</b>	<b>Consistency Statement</b>
<p>G 2, P 2:2: All street improvements should be designed with sufficient capacity to accommodate anticipated traffic volumes based on the intensity of existing and planned land use.</p> <p>G 2, P 2:3: Design and employ traffic control measures to ensure that City streets and roads function safely and efficiently.</p> <p>G 2, P 2:6: Discourage through traffic from using local collector and residential streets.</p> <p>G 2, P 2:7: Seek to maintain at least LOS E during peak hours at intersections, except at locations where LOS F currently exists.</p>	<p>A and C is not expected to trigger the need for future roadway improvements based upon the TIA prepared for the Project.</p>
<p>G 2, P 2:8: Regulate the intensity and stages of development so that traffic on any arterial remains in balance with roadway capacity.</p> <p>G 2, P 2:9: As new development or redevelopment occurs, limit driveway and alley access onto arterial streets wherever possible to enhance the quality of traffic flow.</p> <p>G 2, P 2:10: Consider locating bus turn-outs where appropriate along heavily-traveled arterials or where the lack of a turn-out would be detrimental to traffic flow.</p> <p>G 2, P 2:13: Require future dedication for widening of streets and alleys as new development occurs. Prepare and maintain a master map of right-of-way dedications to be pursued as new development proposals are considered. Establish a maintenance program for utilities in alleys (e.g., lighting), access and upgrading of existing alleys</p>	
<p><b>Goal 4: Support the use of the public transportation, including light rail transit, to provide mobility to all City residents and encourage use of public transportation as an alternative to automobile travel.</b></p> <p>Policy 4:1: Comply with the requirements of Americans with Disabilities Act (ADA) to ensure accessibility of elderly and disabled persons to public transportation. Continue to support Access Services, which provides ADA-compliant Para transit services (dial-a-ride service) in the City.</p> <p>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.</p> <p>Policy 4:5: Require new development along arterial streets to provide transit facilities, such</p>	<p><b>Consistent.</b> See Goal 1 above.</p> <p>In addition, the Specific Plan site is located 0.2 miles from bus stops serviced both by Foothill Transit and METRO. All public pedestrian access paths within the Specific Plan area and leading to transit stops would be ADA accessible. Future development with ZCA Areas and C would be also be required to install ADA accessible paths.</p>



**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
<p>as bus shelters and turn-outs designed to established standards and specifications, where deemed necessary.</p>	
<p><b>GOAL 6: Protect and encourage non-motorized transportation such as bicycle and pedestrian travel.</b>                      G 6, P 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.                      G 6, P 6:4: Continue to improve the accessibility of pedestrian facilities to the elderly and disabled, through such measures as construction of wheelchair ramps.                      G 6, P 6:5: Encourage the provision of an accessible and secure area for bicycle storage at all new and existing developments.                      G 6, P 6:6: Encourage provision of bicycle racks or storage facilities at public gathering places.                      G 6, P 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.                      G 6, P 6:9: Continue installation of facilities accessible for disabled persons and link public facilities and commercial areas to residential neighborhoods. The use of audible warning devices at intersections along these routes should be considered.</p>	<p><b>Consistent.</b> See Goal 1 above.</p> <p>For ZCA Area B, efficient pedestrian circulation would be provided throughout the Specific Plan development via multiple pedestrian access points and pathways. Four resident-restricted pedestrian access points are located on West Evergreen Avenue, with another via the Woonerf. Additional private pedestrian paths are located elsewhere throughout the site, including along the southern edge, adjacent to the METRO Gold Line right-of-way. Public pedestrian access is along South Magnolia Avenue and into the site via the Woonerf. All access points and pathways would be ADA accessible.</p> <p>Elevators located within the parking structure would allow for handicap accessibility to all levels, with ADA compliant paths and hallways provided. Interior pedestrian movement would operate by a network of interior halls, outdoor pathways/walkways, and connections from the parking structure. Courtyards would have direct access and handicap access.</p> <p>The Specific Plan includes bike parking for METRO users and; long-term resident bicycle parking and storage is located in the parking structure and in two locations within the residential structure, A total of 282 bicycle parking spaces are provided throughout the site, 58 of which are public.</p> <p>Improved pedestrian traffic and connection to Station Square Transit Village (PD-12) to the east, is also encouraged in ZCA Area C under the Specific Provisions of PD-27. Specifically, the addition of well-designed storefronts to the existing commercial/industrial complex is encouraged and shall be permitted to create openings on the north and east building elevations. In addition, the existing commercial/industrial complex may be permitted to be incorporated into an adjacent Specific Plan Area as a mixed-use component, through an amendment to the Specific Plan, if new store fronts and pedestrian paths of travel are oriented toward the Specific Plan Area to create pedestrian linkages. Future redevelopment of the site may also include pedestrian-oriented commercial uses</p>

**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
	and activities that support the transit oriented neighborhood.
<p><b>Goal 8: Provide an adequate supply of convenient parking for all developments in the City, in a manner consistent with the goals of managing transportation demand and providing efficient arterial traffic flows.</b>                      G 8, P 8:2: Require all new developments to provide off-street parking in compliance with the City's Zoning Code and the requirements of the ADA.</p>	<p><b>Consistent.</b> All developments under the Project would be required to provide off-street parking in accordance with the City's Zoning Code and Specific Provisions of the new PD-27, as well as meet all ADA requirements. In addition, the Alexan Foothills Specific Plan would provide a parking structure containing adequate parking for residents as well as additional parking for the public utilizing the nearby METRO station nearby.</p>
<b>Noise Element</b>	
<p><b>Program No. 2:</b> The City will extend the California Building Code (California Code of Regulations, Title 24, Part 2, Appendix Chapter 12) requirements for noise mitigation in the design and construction of new multi-family residential developments, hotels, motels, dormitories, and apartment houses to include all types of residential developments.</p>	<p><b>Consistent.</b> Mitigation measure MM NOI-1 requires implementation of design features along units facing the I-210 and railroad tracks to ensure that interior and exterior noise standards by the City and State are met and confirmed through required acoustical analysis for all proposed developments under the Project.</p>
<b>Safety Element</b>	
<p><b>Goal 1: Reduce to a minimum the loss of life, disruption of goods and services and destruction of property associated with an earthquake.</b>                      G 1, P 1.3.2: If through 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.</p>	<p><b>Consistent.</b> As discussed in Chapter 10, Geology and Soils, mitigation measure MM GEO-1 requires that a Geotechnical Report be prepared for all proposed development in the PD-27 area, and that all recommended measures in the study are implemented to ensure the stability of the all proposed structures in compliance with California Building Code.</p>
<b>Open Space Element</b>	
<p><b>Goal 1: Expand the physical and social connections linking the City together and bridging to its neighbors.</b>                      G 1, P 1.3: Promote walking and biking connections throughout the Station Square area with integrated public spaces and direct links to the public transportation network.</p>	<p><b>Consistent.</b> See Goals 1 and 6 of the Circulation Element and Goal 1 of the Land Use Element.</p>
<b>Conservation Element</b>	
<p><b>Objective 1. Protection against potential public health dangers through the provision of adequate facilities.</b></p>	<p><b>Consistent.</b> The City conducted a feasibility study to determine the need for additional water and wastewater infrastructure to serve the Alexan Foothills Specific Plan (Stetson Engineers 2019). The study concluded that no additional wastewater infrastructure would be required to serve the Project, but that additional potable water infrastructure would be required. Specifically, additional booster pump capacity at the City's Forebay Pump Station is recommended in addition to 980 feet of pipeline replacements or upgrades along Magnolia Avenue. Under</p>

**Table 14-2: Consistency with General Plan Goals and Policies**

General Plan Goals and Policies	Consistency Statement
	mitigation measure UT-1, payment of in-lieu fees would be required to ensure payment of the fair share of required improvements. Any future buildout in ZCA Areas A and C would also be subject to review and approval of a Specific Plan, where the need for future infrastructure improvements would also be evaluated on a project-specific basis. Finally, mitigation measure UT-2 would ensure that “can and will serve letters” are issued for water and wastewater service prior to issuance of building permits or approval of the final map (whichever occurs first) for new proposed development under the Project.
<b>Objective 2. Determine areas requiring utilities required for the future.</b>	<b>Consistent.</b> See Objective 1.

Based on the analysis contained in Table 14-2, the Project would be consistent with the policies and standards of the General Plan. Finally, impacts of the Project on all issue areas including aesthetics/visual resources, noise, biological resources, cultural resources, water supply and water quality, and transportation would be less than significant or less than significant with implementation of mitigation measures, as discussed in other chapters of this EIR. Therefore, buildout of the Alexan Foothills Specific Plan and ZCA Areas A and C would not conflict City’s General Plan and impacts would be less than significant.

**Consistency with SCAG’s RTP/SCS**

Full buildout of the Project would potentially result in 518 residential units in the 9.63-acre Project area, inclusive of the 436 units proposed under the Alexan Foothills Specific Plan. According to Section 15206(b) of the CEQA Guidelines, a project of this magnitude has the potential to be considered “a project of Statewide, areawide, or regional significance.” Specifically, projects in this category should be noticed to metropolitan planning organizations according to Section 15206(a) of the CEQA Guidelines. For this Project, the applicable metropolitan planning organization is SCAG. Below is an evaluation of the Project’s consistency with SCAG’s 2016 RTP/SCS.

Buildout of the Project would result in a population increase representing approximately one-third of the amount of growth projected in SCAG’s 2016-2040 RTP/SCS for Monrovia. Buildout of the Project with other proposed projects in Monrovia could approach or exceed RTP/SCS growth projections. The Project facilitates infill residential development and transit-oriented development that is expected to reduce overall vehicle trips in the City and region and associated emissions of criteria pollutants and greenhouse gases consistent with the RTP/SCS. Because the Project only contributes one third of projected growth, the contribution of the Project population would be less than considerable.

In addition, a major initiative of SCAG’s 2016-2040 RTP/SCS, is to focus new growth around transit (SCAG 2016). Specifically, the 2016-2040 RTP/SCS supports the development of HQTAs for focusing new growth around transit in the following ways:

- Identifies regional strategic areas for infill and investment;

- Structures the Plan on centers of development;
- Plans for additional housing and jobs near transit; and
- Plans for changing demand in types of housing.

The Project is in a HQTAs and represents the type of Project contemplated by the RTP/SCS in the limited number of HQTAs in the region. Specifically, the General Provisions and the Specific Provisions of the new PD-27 discussed in Chapter 3 encourage development of high density residential and commercial uses to increase housing and jobs in close proximity to the METRO Gold Line Station. Table 14-3 provides a summary of the Project's consistency with applicable goals of the RTP/SCS.

**Table 14-3: Consistency with RTP/SCS Goals**

Goals	Consistency Statement
<b>1. Align the plan investments and policies with improving regional economic development and competitiveness.</b>	Not Applicable.
<b>2. Maximize mobility and accessibility for all people and goods in the region.</b>	<b>Consistent.</b> The Project is within an HQTAs. The Project, including the Alexan Foothills Specific Plan as well as future development within ZCA Areas A and C, provide pedestrian-oriented development adjacent to a transit station and within easy walking distance to commercial areas in Monrovia. Specifically, the Specific Provisions of the new Planned Development (PD)-27 incentivize placement of residential and commercial uses adjacent to transit as well as pedestrian-oriented development. Public parking for the METRO station would be included in the Alexan Foothills Specific Plan as well. Finally, pedestrian walkways and bicycle parking are provided in the Alexan Foothills Specific Plan.
<b>3. Ensure travel safety and reliability for all people and goods in the region.</b>	<b>Consistent.</b> See Goal 2 above.
<b>4. Preserve and ensure a sustainable regional transportation system.</b>	<b>Consistent.</b> See Goal 2 above.
<b>5. Maximize the productivity of our transportation system.</b>	<b>Consistent.</b> See Goal 2 above.
<b>6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</b>	<b>Consistent.</b> See Goal 2 above.
<b>7. Actively encourage and create incentives for energy efficiency, where possible.</b>	<b>Consistent.</b> All development under the Project would be required to comply with Title 24 of the California Building Code requiring the use of energy efficient technologies and methods. The Alexan Foothills Specific Plan also contains development standards and design goals for use of energy efficient techniques
<b>8. Encourage land use and growth patterns that facilitate transit and active transportation.</b>	<b>Consistent.</b> See Goal 2 above.

**Table 14-3: Consistency with RTP/SCS Goals**

Goals	Consistency Statement
<b>9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</b>	Not Applicable.

Therefore, overall the Project would be consistent with the goals and objectives of the RTP/SCS. As such, impacts would be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**14.2.4 Impact Conclusions**

Based on the methodology described above, the Project, would be consistent with the Monrovia General Plan, as well as the RTP/SCS. Many aspects of the development plan and development standards for the Alexan Foothills Specific Plan are consistent with the policies of the General Plan and RTP/SCS related to land use, site planning, architectural design, areawide minimum/maximum parameters. In addition, the Project is within an HQTAs and enables the type of high density residential development near transit stations identified as a goal of the RTP/SCS. Therefore, the Project is consistent with the applicable land use plans and policies, and Project impacts on land use and planning would be less than significant and no mitigation is required.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ADA	Americans with Disabilities Act
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GPA	General Plan Amendment
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HQTAs	High Quality Transit Area
ICU	Intersection Capacity Utilization
LOS	Level of Service
METRO	Los Angeles County Metropolitan Transportation Authority
NCCP	Natural Community Conservation Plan
PD	Planned Development
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SGVCOG	San Gabriel Valley Council of Governments
TIA	Traffic Impact Analysis
TPA	Transit Priority Area
V/C	Volume-to-capacity ratio

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ZCA	Zoning Code Amendment

### **References Cited**

City of Monrovia

- 2002 Noise Element. June 12.
- 1966 Public Service/Conservation Element.
- 2010 City of Monrovia Zoning Map. March.
- 2012 Circulation Element. November 6.
- 2014 2014-2021 Housing Element. February 4.
- 2018 General Plan, Land Use Element. September.

Southern California Association of Governments (SCAG)

- 2016 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Los Angeles, CA.

Stetson Engineers, Inc. (Stetson Engineers)

- 2019 Water Capacity Study for Proposed Station Square Transit Village Projects. Prepared for the City of Monrovia. January 15.

## **15. MINERAL RESOURCES**

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This EIR chapter describes existing mineral resources at the Project site. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project and describes potential impacts that could result from the Project.

Information related to mineral resources was obtained from the “Mines Online” resource on the California Department of Conservation, Division of Mine Reclamation website. The following website was used to obtain information about mineral resources in Monrovia (California Department of Conservation 2017):

<http://maps.conservation.ca.gov/mol/index.html>

According to the California Department of Conservation, Division of Mine Reclamation, the City of Monrovia has no active mines (California Department of Conservation 2018). Additionally, there are no proposals for new mining operations in the City; as there are no lands zoned for mining activities in the City.

### **15.1 SETTING**

### **15.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts on mineral resources that could result from the Project. A project-level analysis was conducted for the GPA area, ZCA Areas A and C, and the Alexan Foothills Specific Plan area (ZCA Area B).

#### **15.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items XII (a) and (b), implementation of the Project would have a significant impact related to mineral resources if it would:

- (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; or
- (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.

#### **15.2.2 Environmental Impacts**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project area contains no active mines or known mineral resources that would require preservation and/or be impacted due to Project implementation. Therefore, there would be no impacts on mineral resources.



## Mitigation Measures

No mitigation measures are required.

### **15.2.3 Impact Conclusions**

The Project would have no impact on mineral resources and no mitigation is required.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GPA	General Plan Amendment
ZCA	Zoning Code Amendment

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## 16. NOISE AND VIBRATION

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This Chapter provides pertinent background information on the nature of sound transmission, describes the existing noise environment in the Project area, includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

### 16.1 SETTING

The environmental and regulatory setting of the Project area with respect to noise and vibration is described based on local, state, and federal regulations along with information from the City of Monrovia General Plan.

#### 16.1.1 Existing Setting

##### **Fundamentals of Environmental Acoustics**

Noise is generally defined as unwanted sound and widely recognized as a form of environmental degradation. Airborne sound is the rapid fluctuation of air pressure above and below atmospheric pressure. The frequency (pitch), amplitude (intensity or loudness), and duration of a sound all contribute to the effect on a listener, or receptor, and whether or not the receptor perceives the sound as “noisy” or annoying.

Pitch is the height or depth of a tone or sound and depends on the frequency of the vibrations by which it is produced. Sound frequency is expressed in terms of cycles per second, or Hertz (Hz). Humans generally hear sounds with frequencies between 20 and 20,000 Hz and perceive higher frequency sounds, or high pitch noise, as louder than low-frequency sound or sounds low in pitch. Sound intensity or loudness is a function of the amplitude of the pressure wave generated by a noise source combined with the reception characteristics of the human ear. Atmospheric factors and obstructions between the noise source and receptor also affect the loudness perceived by the receptor. Sound pressure levels are typically expressed on a logarithmic scale in terms of decibels (dB). A dB is a unit of measurement that indicates the relative amplitude (i.e., intensity or loudness) of a sound, with 0 dB corresponding roughly to the threshold of hearing for the healthy, unimpaired human ear.

Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 dBs represents a ten-fold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 times more intense, etc. In general, there is a relationship between the subjective noisiness or loudness of a sound and its intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness. Due to the logarithmic basis, decibels cannot be directly added or subtracted together using common arithmetic operations:

$$50 \text{ decibels} + 50 \text{ decibels} \neq 100 \text{ decibels}$$

Instead, the combined sound level from two or more sources must be combined logarithmically. For example, if one noise source produces a sound power level of 50 dBA, two of the same sources would combine to produce 53 dB as shown below.

$$10 * 10 \log \left( 10^{\left(\frac{50}{10}\right)} + 10^{\left(\frac{50}{10}\right)} \right) = 53 \text{ decibels}$$

In general, when one source is 10 dB higher than another source, the quieter source does not add to the sound levels produced by the louder source because the louder source contains ten times more sound energy than the quieter source.

### **Sound Characterization**

Although humans generally can hear sounds with frequencies between 20 and 20,000 Hz, most of the sounds that humans are normally exposed to do not consist of a single frequency, but rather a broad range of frequencies perceived differently by the human ear. In general, humans are most sensitive to the frequency range of 1,000–8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. Instruments used to measure sound, therefore, include an electrical filter that enables the instrument's detectors to replicate human hearing. This filter, known as the "A-weighting" or "A-weighted sound level" filters low and very high frequencies, giving greater weight to the frequencies of sound to which the human ear is typically most sensitive. Most environmental measurements are reported in dBA, meaning decibels on the A-scale. See Table 16-1 for a list common noise sources and their A-weighted noise levels.

Sound levels are usually not steady and vary over time. Therefore, a method for describing either the average character of the sound or the statistical behavior of the variations over a period of time is necessary. The continuous equivalent noise level (Leq) descriptor is used to represent the average character of the sound over a period of time. The Leq represents the level of steady-state noise that would have the same acoustical energy as the sum of the time-varying noise measured over a given time period. Leq is useful for evaluating shorter time periods over the course of a day. The most common Leq averaging period is hourly, but Leq can describe any series of noise events over a given time period.

Variable noise levels are the values that are exceeded for a portion of the measured time period. Thus, the L1, L10, L50, and L90 descriptors represent the sound levels exceeded 1%, 10%, 50%, and 90% of the time the measurement was performed. The L90 value usually corresponds to the background sound level at the measurement location.

When considering environmental noise, it is important to account for the different responses people have to daytime and nighttime noise. During the nighttime, background noise levels are generally quieter than during the daytime but also more noticeable due to the fact that household noise has decreased as people begin to retire and sleep. Noise exposure over the course of an entire day is described by the day/night average sound level, DNL (or Ldn), and the community noise equivalent level, or CNEL, descriptors. Both descriptors represent the 24-hour noise exposure in a community or area. For DNL, the 24-hour day is divided into a 15-hour daytime period (7 AM to 10 PM) and a 9-hour nighttime period (10 PM to 7 AM) and a 10 dB "penalty" is added to measure nighttime noise levels when calculating the 24-hour average noise level. For example, a 45 dBA nighttime sound level would contribute as much to the overall day-night average as a 55 dBA daytime sound level. The CNEL descriptor is similar to Ldn, except that it includes an additional 5 dBA penalty for noise events that occur during the evening time period (7 PM to 10 PM). The artificial penalties imposed during DNL and CNEL calculations are intended to account for a receptor's increased sensitivity to noise levels during quieter nighttime periods.

**Table 16-1: Typical Outdoor and Indoor Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Jet flyover at 1,000 feet	-110-	Rock Band
Gas lawn mower at 3 feet	-100-	
Diesel truck at 50 feet at 50 mph	-90-	Food blender at 3 feet
Noise urban area, daytime	-80-	Garbage disposal at 3 feet
Gas lawnmower, 100 feet	-70-	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	-60-	Large business office
Quiet urban daytime	-50	Dishwasher next room
Quite urban nighttime	-40-	Theater, large conference room (background)
Quiet suburban nighttime		
	-30-	Library
Quite rural nighttime		Bedroom at night
	-20-	
		Broadcast/recording studio
	-10-	
Typical threshold of human hearing	-0-	Typical threshold of human hearing

Source: Caltrans 2013a

**Sound Propagation**

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise generating source. The strength of the source is often characterized by its “sound power level.” Sound power level is independent of the distance a receiver is from the source and is a property of the source alone. Knowing the sound power level of an idealized source and its distance from a receiver, the sound pressure level at a specific point (e.g., a property line or a receiver) can be calculated based on geometrical spreading and attenuation (noise reduction) as a result of distance and environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and shielding by terrain or barriers.

For an ideal “point” source of sound, such as mechanical equipment, the energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out in a spherical pattern and travels away from the point source. Theoretically, the sound level attenuates, or decreases, by 6 dB with each doubling of distance from the point source. In contrast, a “line” source of sound, such as roadway traffic or a rail line, spreads out in a cylindrical pattern and theoretically attenuates by 3 dB with each doubling of distance from the line source; however, the sound level at a receptor location can be modified further by additional factors. The first is the presence of a reflecting plane such as the ground. For hard ground, a reflecting plane typically increases A-weighted sound pressure levels by 3 dB. If some of the reflected sound is absorbed by the surface, this increase will be less than 3 dB. Other factors affecting the predicted sound pressure level are often lumped together into a term called “excess attenuation.” Excess attenuation is the amount of additional attenuation that occurs beyond simple spherical or cylindrical spreading. For sound propagation outdoors, there is almost always excess attenuation, producing lower levels than what would be predicted by spherical or cylindrical spreading. Some examples include attenuation by sound absorption in air; attenuation by barriers; attenuation by rain, sleet, snow, or fog; attenuation by grass, shrubbery, and trees; and attenuation from shadow zones created by wind and temperature gradients. Under certain meteorological conditions, like fog and low-level clouds, some of these excess attenuation mechanisms are reduced or eliminated due to noise reflection.

## **Noise Effects**

Noise effects on human beings are generally categorized as:

- Subjective effects of annoyance, nuisance, and/or dissatisfaction;
- Interference with activities such as speech, sleep, learning, or relaxing; or
- Physiological effects such as startling and hearing loss.

Most environmental noise levels produce subjective or interference effects; physiological effects are usually limited to high noise environments, such as industrial manufacturing facilities or airports.

Predicting the subjective and interference effects of noise is difficult due to the wide variation in individual thresholds of annoyance and past experiences with noise; however, an accepted method to determine a person’s subjective reaction to a new noise source is to compare it to the existing environment without the noise source, or the “ambient” noise environment. In general, the more a new noise source exceeds the ambient noise level, the more likely it is to be considered annoying and to disturb normal activities.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1-dB changes in sound levels when exposed to steady, single-frequency (“pure-tone”) signals in the mid-frequency (1,000–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5 dB increase is generally perceived as a distinctly noticeable increase, and a 10 dB increase is generally perceived as a doubling of loudness that would almost certainly cause an adverse response from community noise receptors.

## **Groundborne Vibration and Noise**

Vibration is the movement of particles within a medium or object such as the ground or a building. Vibration may be caused by natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or humans (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources are usually characterized as continuous, such as factory machinery, or transient, such as explosions.

As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency; however, unlike airborne sound, there is no standard way of measuring and reporting amplitude. Vibration amplitudes can be expressed in terms of velocity (inches per second) or discussed in dB units in order to compress the range of numbers required to describe vibration. Vibration impacts to buildings are usually discussed in terms of peak particle velocity (PPV) in inches per second (in/sec). PPV represents the maximum instantaneous positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Vibration can also be measured in vibration velocity levels or velocity decibels ( $V_{db}$ ).

Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (such as crack plaster or destroy windows). Ground-borne vibration can also disrupt the use of sensitive medical and scientific instruments, such as electron microscopes.

Common sources of vibration within communities include construction activities and railroads. Ground-borne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities. Next to pile driving, grading activity has the greatest potential for vibration impacts if large bulldozers, large trucks, or other heavy equipment are used.

## **Existing Noise and Vibration Environment**

Located in the southern part of the City of Monrovia, the Project area is generally configured in an east-west orientation and is bounded by South Magnolia Avenue to the east, South Mayflower Avenue to the west, Evergreen Avenue and Interstate-210 (I-210, or the Foothill Freeway) to the north, and the METRO Gold Line light rail to the south. The Project area consists mostly of a mix of light industrial and commercial land uses, although five residential units are present in the Project area. In general, medium and high density residential development borders the Project area, across Magnolia Avenue, Mayflower Avenue, and the METRO Gold Line.

The Project is adjacent to the City's Station Square Transit Village, and the Gold Line Monrovia Station is located less than 500 feet east of the Project (addressed at 1641 South Primrose Avenue). Several transit-oriented, multi-family developments are planned for the near future (e.g., the Station Square South project, located adjacent to the Project, across South Magnolia Avenue and South of the Gold Line). The closest airport to the Project is the San Gabriel Valley Airport, located approximately 3.7 miles southwest of the Project.

The General Plan Noise Element identifies traffic noise on major arterial streets and the I-210 as the most pervasive source of noise in certain areas of the City. The General Plan specifically notes that residential areas south of I-210 are impacted by freeway noise. The eastbound segment of I-210 includes an approximately 12-foot high wall that terminates on the eastern

side of South Mayflower Avenue; a similar wall begins 200 feet west of South Magnolia Avenue. For the most part the segment of I-210 directly adjacent to the Project (i.e., between South Mayflower and South Magnolia Avenue) does not contain a sound wall. This portion of the I-210 is elevated, approximately 20 feet above the Project area.

The General Plan Noise Element was prepared in 2002, before the METRO Gold Line began operation, and does not identify potential noise levels associated with Gold Line operation; however, the Gold Line Foothill Extension Pasadena to Montclair Final Environmental Impact Report predicted the following noise levels for eastbound and westbound light rail service at residential receptors in the City:

- Eastbound Gold Line noise levels south of the right of way (ROW) were predicted to be 72 DNL or less within approximately 40 feet of the eastbound track, 65 DNL or less within approximately 50 feet of the eastbound track, and less than 60 DNL approximately 100 feet of the eastbound track (Metro Gold Line Foothill Extension Construction Authority [MGLFECA] 2007, Table 3-11.6).
- Westbound Gold Line noise levels north of the ROW were predicted to be 71 DNL or less within approximately 40 feet of the westbound track, 68 DNL or less within approximately 60 feet of the westbound track, and less than 60 DNL approximately 100 feet of the eastbound track (MGLFECA 2007, Table 3-11.6).

The City's 2008 General Plan Land Use Policy 6.1 requires that new residences proposed near the I-210 and METRO railroad tracks are designed to reduce the intrusion of sound into the dwellings.

The existing ambient noise and vibration environment at and near the Project area is described in more detail below.

### **Measured Ambient Noise Levels**

The existing ambient noise levels in the Project area were monitored in June 2018 (MIG 2019; see Appendix I). Ambient noise levels were measured with two Larson Davis SoundTrack LxT Type 1 sound level meters; ambient noise measurements were collected in 10-minute intervals. Conditions during the monitoring were generally clear and sunny during the daytime, with a daily high of approximately 90 degrees Fahrenheit and winds from the west/southwest between approximately five to 10 miles per hour.

The ambient noise monitoring conducted for this EIR included five short-term (ST) and two long-term (LT) measurements at locations selected to:

- Provide direct observations of existing noise sources at and in the vicinity of the Project;
- Determine typical ambient noise levels at and in the vicinity of the Project; and
- Evaluate potential Project noise levels at nearby sensitive receptors (see Noise Sensitive Receptors below).

The ambient noise monitoring locations are described below and shown in Figure 16-1.

- **Location ST-1** was at the intersection of South Magnolia Avenue and the METRO Gold Line, at the southeast corner of the Project area. The ambient noise levels measured at



location ST-1 are considered representative of background daytime noise levels associated with local commercial land uses in the area, the METRO Gold Line, and traffic on South Magnolia Avenue.

- **Location ST-2** was at the intersection of South Magnolia Avenue and West Evergreen Avenue, at the northeast corner of the Project area. The ambient noise levels measured at location ST-2 are considered representative of background daytime noise levels associated with the local commercial and other lands uses in the area, as well as traffic noise levels associated with I-210.
- **Location ST-3** was at the intersection of South Mayflower Avenue and West Evergreen Avenue, at the northwest corner of the Project area. The ambient noise levels measured at location ST-3 are considered representative of background daytime noise levels associated with the local commercial and other land uses in the area, as well as traffic noise levels associated with I-210.
- **Location ST-4** was at the intersection of South Mayflower Avenue and the METRO Gold Line, at the southwest corner of the Project area. The ambient noise levels measured at location ST-4 are considered representative of background daytime noise levels associated with the local residential land uses in the area, the METRO Gold Line, and traffic on South Mayflower Avenue.
- **Location ST-5** was on Evergreen Avenue, approximately 100 feet east of Mayflower Avenue. The ambient noise levels measured at location ST-5 are considered representative of background daytime noise levels associated with the local commercial and other land uses in the area, as well as traffic noise levels associated with I-210.
- **Location LT-1** was on Evergreen Avenue, approximately 205 feet west of South Magnolia Avenue. The ambient noise levels measured at location LT-1 are considered representative of 24-hour ambient noise exposure levels in the northern half of the Project area.
- **Location LT-2** was adjacent to the METRO Gold Line, approximately 215 feet west of South Magnolia Avenue (as measured along the METRO right-of-way [ROW]). The ambient noise levels measured at location LT-2 are considered representative of 24-hour ambient noise exposure levels in the southern half of the Project area.

Based on observations made during the ambient noise monitoring, the existing noise environment in the Project vicinity consists primarily of transportation noise sources, particularly vehicular traffic on I-210 and rail activity on the METRO Gold Line. Table 16-2 summarizes the results of the ambient noise monitoring conducted for this EIR.

**Table 16-2 Existing Ambient Noise Levels in the Project Area (dBA)**

Monitoring Site	Duration	Lmin	Lmax	Leq Range			CNEL
				Daytime (7 AM - 7 PM)	Evening (7 PM - 10 PM)	Nighttime (10 PM - 7 AM)	
ST-1	30 Minutes	49.7	87.9	63.7 - 70.3	--	--	--
ST-2	30 Minutes	60.3	79.4	66.2 - 77.4	--	--	--
ST-3	30 Minutes	57.9	86.7	67.8 - 68.7	--	--	--
ST-4	30 Minutes	53.5	94.4	67.5 - 73.9	--	--	--
ST-5	20 Minutes	61.1	78.2	66.5 - 66.9	--	--	--
LT-1	24-Hours	47.8	92.3	64.3 - 70.3	67.0 - 73.1	62.1 - 70.0	73.5
LT-2	24-Hours	39.2	93.5	68.9 - 73.5	68.2 - 71.8	61.6 - 71.5	75.1

Source: MIG 2019 (see Appendix I)

**Figure 16-1 Noise Measurement Locations**



## **Existing METRO Gold Line Noise and Vibration Levels**

The Project area is located adjacent to the METRO Gold Line. Rail-related noise comes from several potential sources. A locomotive engine's propulsion system generates noise from mechanical and electrical systems. The interaction of wheels with the track produces various noises, particularly where the wheel encounters a flaw or defect along smooth wheel / track surfaces. Finally, train horn or bells and railroad crossing warning devices generate short but loud alerts pursuant to federal safety regulations.

The METRO Gold Line is a commuter rail line with eastbound and westbound service at the Monrovia Station every 7 to 14 minutes Monday through Friday. Peak hourly weekday activity occurs during the AM and PM commuter periods when 9 eastbound and westbound trains can occur in an hour; typical service involves 4 to 5 eastbound and westbound trains per hour. During the weekday, service runs nearly 20 hours a day. Weekend service also runs nearly 24 hours a day, with 3 to 5 eastbound and westbound trains per hour. The METRO Gold Line crosses South Magnolia and South Mayflower Avenue at grade, with guards and warning bells provided for safety.

During the ambient noise monitoring, noise levels associated with the METRO Gold Line were observed to be in the range of 69 to 94 dB while passing at distance of approximately 5 to 20 feet from the center of the westbound track. The higher noise levels were associated with longer light rail trains (4 cars instead of 3 cars) accelerating westbound from the Monrovia Station.

Vibration monitoring was not conducted specifically for the Project; however, vibration monitoring was conducted in January 2018 for the Initial Study/Mitigated Negative Declaration for the adjacent South Station Square project (City of Monrovia 2018). The vibration monitoring for the South Station Square project was conducted approximately 525 feet from the Project, at a distance of 20 feet from the track centerline. The results of this monitoring indicate vibration levels generated by the existing METRO Gold Line are less than 0.002 PPV and 61 velocity decibels (VdB) (a measure of the vibration velocity level).

## **Noise Sensitive Receptors**

Noise sensitive receptors are buildings or areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Residential areas, motels and hotels, hospitals and health care facilities, school facilities, and parks are examples of noise receptors that could be sensitive to changes in existing environmental noise levels. Table 16-3 summarizes the noise sensitive receptors in proximity of the proposed boundary of the Alexan Specific Plan as well as the boundary of ZCA Areas A and C.

**Table 16-3 Sensitive Receptor Locations**

Receptor	Land Use	Direction / Location	Distance From	
			Alexan Foothills Specific Plan	ZCA Areas A and C <sup>(A)</sup>
R-1A	Single-Family Residential	East; along S. Magnolia Ave, W. Evergreen Ave, and Pomona Ave	60 ft	60ft
R-1B	Multi-Family Residential			
R-2	Multi-Family Residential	South; across the METRO Gold Line ROW (accessed via S. Mayflower Ave and Genoa St)	70 ft	70 ft
R-3	Single-Family Residential	West; along Diamond Street and the western portion of S. Mayflower Ave	260 ft	80 ft
R-4	Single-Family Residential	West; along the eastern portion of S. Mayflower Ave	70 ft	-- <sup>(B)</sup>
Source: MIG 2019. Notes: (A) ZCA Areas A and C are comprised of a western portion (Parcels 4, 5, 6, 9, 14, and 15). (B) There is no distance reported because R-4 is located within ZCA Areas A and C.				

In addition, once constructed and occupied, the residential receptors associated within the Alexan Foothills Specific Plan would represent new sensitive noise receptors. However, the nearest receptor locations to each Project component are shown in Table 16-3.

### **16.1.2 Regulatory Setting**

#### **Federal**

##### ***Federal Transit Administration (FTA)***

No federal regulations apply to noise or vibration from the Project, but the FTA's 2006 *Transit Noise and Vibration Impact Assessment* document sets ground-borne vibration annoyance criteria for general assessments. The criteria vary by the type of building being subjected to the vibrations, and the overall number of vibration events occurring each day. Category 1 buildings are considered buildings where vibration would interfere with operation, even at levels that are below human detection. These include buildings with sensitive equipment, such as research facilities and hospitals. Category 2 buildings include residential lands and buildings where people sleep, such as hotels and hospitals. Category 3 buildings consist of institutional land uses with primary daytime uses. The FTA standards vary for "frequent" events (occurring more than 70 times per day such as a rapid transit project), "occasional" events (occurring between 30 to 70 times per day) and "infrequent" events (occurring less than 30 times per day). The FTA's vibration annoyance criteria are summarized in Table 16-4.

**Table 16-4 FTA Ground-Borne Vibration Impact Criteria for General Assessment**

Vibration Land Use Category/Type	Frequent Events	Occasional Events	Infrequent Events
Category 1 – Buildings with sensitive equipment	65 VdB	65 VdB	65 VdB
Category 2 – Buildings where people sleep	72 VdB	75 VdB	80 VdB
Category 3 – Institutional buildings	75 VdB	78 VdB	83 VdB
Source: FTA 2006 Note: VdB = Velocity decibel			

## State

### **California Building Standards Code**

The California Building Standards Code is contained in Title 24 of the California Code of Regulations and consists of 11 different parts that set various construction and building requirements. Part 2, California Building Code, Section 1207, Sound Transmission, establishes sound transmission standards for interior walls, partitions, and floor/ceiling assemblies. Specifically, Section 1207.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room.

### **California Green Building Standards Code**

The California Green Building Standards Code is Part 11 to the California Building Standards Code. Relevant sections of Chapter 5, Nonresidential Mandatory Standards are noted below:

- Section 5.507.4.1.1 sets forth that buildings exposed to a noise level of 65 dB Leq (1-hour) during any hour of operation shall have exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composting sound transmission class (STC) rating of at least 45 (or an outdoor indoor transmission class (OITC) of 35, with exterior windows of a minimum STC of 40.
- Section 5.507.4.2 sets forth that wall and roof assemblies for buildings exposed to a 65 dBA Leq pursuant to Section 5.507.4.1.1, shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA Leq in occupied areas during any hour of operation. This requirement shall be documented by preparing an acoustical analysis documenting interior sound levels prepared by personnel approved by the architect or engineer of record.

## Caltrans

The California Department of Transportation’s (Caltrans) *Transportation and Construction Vibration Guidance Manual* provides a summary of vibration criteria that have been reported by researchers, organizations, and governmental agencies (Caltrans 2013). Chapters Six and Seven of this manual summarize vibration detection and annoyance criteria from various agencies and provide Caltrans’ recommended guidelines and thresholds for evaluating potential vibration impacts on buildings and humans from transportation and construction projects. These thresholds are summarized in Table 16-5 and Table 16-6.

**Table 16-5 Caltrans' Vibration Threshold Criteria for Building Damage**

Structural Integrity	Maximum PPV (in/sec)	
	Transient	Continuous
Extremely fragile buildings, ruins, monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some older buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial and commercial structures	2.00	0.50
Source: Caltrans 2013b Note: PPV = peak particle velocity		

**Table 16-6 Caltrans' Vibration Threshold Criteria for Human Response**

Human Response	Maximum PPV (in/sec)	
	Transient	Continuous
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severely perceptible	2.00	0.40
Source: Caltrans 2013b Note: PPV = peak particle velocity		

## County

Section 12.08.560 of the Los Angeles County Noise Control Ordinance limits vibration levels from a source to other properties of 0.01 in/sec PPV.

## Local

The City of Monrovia General Plan and Municipal Code establish standards related to noise and vibration control.

### ***City of Monrovia General Plan Noise Element***

The City of Monrovia Noise Element includes several noise control programs designed to protect the City's residents from the adverse effects of uncontrolled noise by controlling noise at its source, as well as attenuating noise between the source and the receiver. The General Plan includes the following noise control programs that are relevant to the Project:

- **Program No. 1:** The City will continue to implement and enforce the City of Monrovia's noise ordinance for the control of unnecessary and unwanted noises. The ordinance should be enforced by the Building and Planning Department and the Police Department. The noise ordinance enforcement program should be provided with the necessary funding and expertise to ensure its effective enforcement.

- **Program No. 2:** The City will extend the California Building Code (California Code of Regulations, Title 24, Part 2, Appendix Chapter 12) requirements for noise mitigation in the design and construction of new multi-family residential developments, hotels, motels, dormitories, and apartment houses to include all types of residential developments. The regulations state: “Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either ... Ldn or ... CNEL, consistent with the noise element of the general plan.” Additionally, an acoustical design analysis shall be required of any planned residential building or structure which is to be located where the exterior CNEL or Ldn exceed 60 dB. The residential design should be such that the interior living spaces are exposed to an Ldn or CNEL of no more than 45 dB. This may be accomplished by implementing a combination of the following:
  1. A reduction of the exterior noise to which the dwelling is exposed.
  2. Installing sound rated windows suitable for the noise reduction required.
  3. Configuring and insulating exterior walls and roofing systems to reduce the interior noise to acceptable levels.
  4. Locating (or eliminating) vents, mail slots, etc., to minimize sound propagation into the home.
  5. Installing forced air ventilation as needed to provide a habitable living space if the interior Ldn or CNEL level is to be met with all or some windows closed.
- **Program No. 3:** The City may implement a noise zoning code, defining compatible land usage requirements based on the guidelines of Figure 2. The City would require an analysis of whether or not the proposed development would be in compliance with this code. If the development falls in the CNEL or Ldn range above that indicated for the normally acceptable category, noise control design steps must be included in the project plans.
- **Program No. 6:** Future projects within the City will reflect a consciousness on the part of the City regarding the reduction of unnecessary noise near noise-sensitive areas such as residences, schools, parks, hospitals, libraries, and convalescent homes. Actions that can be taken to implement this program can include:
  1. Maintain liaison with transportation agencies such as Caltrans and the FHWA regarding the reduction of noise from existing facilities. The design and location of new facilities will also be considered.
  2. Consideration should be given to buffering noise-sensitive areas from noise-generating land uses.
  3. Noise monitoring within the City will be an ongoing process conducted by the appropriate departments.
  4. Ensure that the segment of the Pasadena Blue Line Extension project that would go through the City of Monrovia will be designed to meet FTA and other relevant noise criteria; close attention shall be paid to the potential adverse noise effects on residences and other noise sensitive receptors located in the vicinity of the proposed Blue Line station near the Myrtle Avenue / Duarte Road intersection, as well along the transit route.<sup>1</sup>

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<sup>1</sup> The Noise Element was adopted in 2002, which was before the light rail extension was completed. All the other actions listed under Program No. 6 are applicable to future development projects.



5. Close attention shall be paid to the noise evaluation in environmental assessments, environmental impact reports and environmental impact statements.

Regarding Noise Control Program No. 3, the land use compatibility guidelines referenced in the 2002 General Plan Noise Element are reproduced in Table 16-7; however, the City has not adopted nor incorporated land use noise compatibility standards into its zoning code.

**Table 16-7 General Plan Land Use Compatibility Guidelines**

Land Use Category	Community Noise Equivalent Level (in dBA, CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density Single Family, Duplex, Mobile homes	≤ 60	≤ 70	≤ 75	> 75
Residential – Multi Family	≤ 65	≤ 70	≤ 75	> 75
Transient Lodging – Motels, Hotels	≤ 65	≤ 70	≤ 80	> 80
Schools, Libraries, Churches, Hospitals, Nursing Homes	≤ 70	≤ 70	≤ 80	> 80
Auditoriums, Concert Halls, Amphitheaters	--	≤ 65	--	> 80
Sports Arenas, Outdoor Spectator Sports	--	≤ 70	--	> 70
Playground, Neighborhood Parks	≤ 70	--	≤ 75	> 75
Golf Course, Riding Stables, Water Recreation, Cemeteries	≤ 75	--	≤ 80	> 80
Office Buildings, Business Commercial and Professional	≤ 70	≤ 77.5	> 77.5	--
Industrial, Manufacturing, Utilities, Agriculture	≤ 75	≤ 80	> 80	--

Source: City of Monrovia General Plan Noise Element

Notes:

Land Use Compatibility Interpretation:

Normally Acceptable: Specific land use is satisfactory based upon the assumption buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analyses of noise reduction requirements are made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should be generally discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New development should generally not be undertaken.

### ***City of Monrovia Municipal Code***

The City's existing Municipal Code regulates unnecessary, excessive, and annoying noise and vibration generated by certain sources of noise. The City's code is intended to maintain quiet residential areas that exhibit low noise levels, and to implement programs that reduce noise in residential areas where noise levels are above acceptable values.

Existing Municipal Code Title 9, Public Peace, Morals, and Safety, Chapter 9.44, Noise, includes the following standards related to noise:

- Section 9.44.030, General Prohibition, sets forth that it is unlawful for any person to willfully generate any loud, unnecessary, or unusual noise which unreasonably disturbs the peace and quiet of any neighborhood or which causes any discomfort or annoyance to any reasonable person of normal sensitivity, given factors such as the volume, intensity, nature, duration, and timing of the noise.
- Section 9.44.040, Allowable Noise Levels, sets forth that no person shall create or allow the creation of noise on any residential property which causes the noise level to exceed the actual measured median ambient noise level, or the following presumed ambient noise level, whichever is greater:
  - During the daytime (7 AM to 9 PM), the allowable noise level is 55 dBA
  - During the nighttime (9 PM to 7 AM), the allowable noise level is 50 dBA

If the intruding noise source is continuous and cannot be reasonably discontinued for sufficient time in which the ambient noise level can be determined, the presumed ambient noise level shall be used.

- Section 9.44.060, Permitted Increases in Noise Levels, sets forth that increase in the allowable noise levels described above are permitted as follows:
  - A 5 dBA increase is permitted for 15 minutes per hour
  - A 10 dBA increase is permitted for 5 minutes per hour
  - A 15 dBA increase is permitted for 1 minute per hour
  - A 20 dBA increase is permitted for less than one minute per hour.
- Section 9.44.080, Exemptions, sets forth that the following activities are exempt from the noise control provisions of the City's Municipal Code:
  - Emergency sounds
  - Noise generating activities made while performing governmental duties
  - Noise generating activities conducted on public playgrounds and public or private school grounds
  - The handling of boxes, crates, containers, garbage cans, or other similar objects between the hours of 7 AM and 7 PM
  - The operation of mechanically powered saws, drills, grinders, lawn or garden tool, or similar tool between 7 AM and 7 PM Monday to Friday and 10 AM and 10 PM on weekends and holidays
  - Construction or demolition work conducted between the hours of 7 AM and 7 PM Monday to Friday and 9 AM and 6 PM on weekends and holidays

- Section 9.44.090, Radios, Television Sets, and Similar Devices, sets forth that it is unlawful for any person within any residential zone to use or operate any radio, musical instrument, stereo system, entertainment system, television set, or other machine or device for producing or reproducing sound between the hours of 10 PM and 7 AM in a manner that disturbs the peace, quiet, and comfort of neighboring residents or any reasonable person of normal sensitivity residing in the area.

Existing Municipal Code Title 17, Zoning, Chapter 17.32, Performance Standards, includes the following standards related to noise and vibration:

- Section 17.32.040, Noises, sets forth that the maximum sound level radiated by any use of facility, when measured at the boundary line of the property on which the sound is generated, shall not be obnoxious by reason of its intensity, pitch or dynamic characteristics, as determined by the City.
- Section 17.32.040, Vibration, sets forth that no vibration shall be permitted which causes a noticeable tremor beyond the boundary line of the property upon which the vibration exists.

## **16.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to noise and vibration that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **16.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items XIII (a) through (c), implementation of the Project would have a significant impact related to noise and vibration if it would:

(a)Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in:

- The City of Monrovia Municipal Code Title 9, Public Peace, Morals, and Safety, Chapter 9.44, Noise; or
- The City of Monrovia Municipal Code Title 17, Zoning, Chapter 17.31, Performance Standards; or
- The City of Monrovia General Plan Noise Element; or
- Other potentially applicable state or agency standards.

(b)Generate excessive ground vibration or ground-borne noise levels.

(c)For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would expose people residing or working in the project area to excessive noise levels.

For the purposes of this EIR, the Project would result in a substantial permanent increase in ambient noise levels if it would:

- Cause the Ldn at an adjacent land use to increase by 5.0 dBA or more where noise levels would remain below the land use compatibility guidelines referenced in the 2002 General Plan Noise Element (reproduced in Table 16-7); or
- Cause the Ldn at an adjacent land use to increase by 3.0 dBA or more where noise levels would equal or exceed the land use compatibility guidelines referenced in the 2002 General Plan Noise Element (reproduced in Table 16-7).

For the purposes of this EIR, the Project would result in a substantial temporary or periodic noise impact if it would:

- Result in a 10 dB or greater increase in hourly noise levels above ambient conditions for two or more hours per day, five days a week, for a period of 12 months or more.

For temporary construction noise, the City considers construction activities resulting in a 10 dB increase in hourly noise levels above ambient conditions to be a temporary and substantial increase in noise levels, provided this increase occurs for two or more hours a day, five days a week, for more than 12 months. A 10 dB increase above existing ambient conditions is typically perceived as a “doubling” of loudness, which in limited doses would not be substantial. Prolonged exposure to project-specific construction noise levels that are twice as loud as the ambient environmental level in which the receiver is accustomed to, however, would be considered substantial, even if such noise levels occur on a temporary basis.

### **16.2.2 Environmental Impacts**

#### **IMPACT NOI-1: EXPOSURE TO OR GENERATION OF NOISE LEVELS THAT EXCEED STANDARDS**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project would result in the placement of new, noise-sensitive, residential land uses in close proximity to the I-210 and METRO Gold Line. The following analysis evaluates if new residential receptors in the Project area would be exposed to noise levels that exceed City standards. The analysis also evaluates if the new residential developments would generate noise levels that could exceed City standards.

##### ***Exposure to Noise Levels that Exceed Standards***

As shown earlier in Table 16-2, the Project area is subject to high ambient noise levels that are primarily associated with traffic noise from I-210 and rail noise from the METRO Gold Line. Measures daytime and nighttime hourly noise levels were generally above 65 dBA Leq (as measured at the Project area boundary) and did not fluctuate significantly, indicating noise levels associated with the I-120 and the METRO Gold Line are consistent throughout the daytime and nighttime period.

The calculated CNEL (at the Project area boundary) adjacent to the I-210 and METRO Gold Line is 73.5 and 75.1 CNEL, respectively (Table 16-2). Although these noise levels represent

existing conditions, they are not expected to change substantially in the future since traffic volumes on I-210 are already substantial and the METRO Gold Line currently operates with a high level of frequency.

### ***Alexan Foothills Specific Plan Noise Exposure***

The current conceptual site plan for the Alexan Foothills Specific Plan includes a number of design features that would reduce noise levels at exterior building facades and corresponding interior noise levels, including:

- Building setbacks of at least 20 feet or more from the edge of the West Evergreen and METRO Gold Line ROWs.
- Building orientation that limits exterior residential wall exposure to direct noise from the I-210 and the METRO Gold Line. The current conceptual site plan shows 27 units with exterior wall exposure to the I-210 (plus one exterior roof deck) and 45 units with exterior wall exposure to the METRO Gold Line. Thus, only 16% of the total available units would be subject to the worst-case noise levels at the site.
- Residential unit design that places bedrooms on the interior of the unit and less sensitive spaces (kitchens, closets, etc.) along the exterior wall facing the I-210 and METRO Gold Line ROW.
- Use of outdoor recreation space and the proposed parking garage to buffer residential units from noise associated with the I-210 and the METRO Gold Line. Higher noise levels are generally acceptable in outdoor recreation spaces due to the shorter exposure period (i.e., non-continuous, short-term exposure) and the fact that outdoor activities are typically less sensitive to the subjective and interference effects of noise (e.g., annoyance, nuisance, interference with sleep or speech).
- Incorporation of a vegetated screening wall along the southern property line to limit line of sight / direct observation of METRO Gold trains.

With building setbacks, the CNEL at exterior building facades for the Alexan Foothills Specific Plan would likely be in the range of 71 to 72 CNEL in the northern and southern parts of the Alexan Foothills Specific Plan area. Exterior noise levels at proposed Courtyard #3 and the secondary recreation courtyard would not exceed 70 dB CNEL.

### ***ZCA Areas A and C Noise Exposure***

The ZCA would allow for development of multi-family land use(s) in ZCA Areas A and C that would likely be similar to the proposed Alexan Foothills Specific Plan area (i.e., a multi-story residential development); however, no specific development is proposed at this time. Since building setbacks would be similar to those proposed for the Alexan Foothills Specific Plan, future residential buildings within the ZCA Areas A and C would likely be exposed to similar noise levels as the Alexan Foothills Specific Plan (72 to 74 CNEL in the northern and southern parts of the Project area, respectively).

### ***Impact Significance Determination***

Based on the ambient noise measurements performed for the Project, potential residential units within the Project area that front West Evergreen Avenue and the I-210 would be exposed to noise levels of approximately 72 CNEL, while potential residential units that front the METRO Gold Line ROW would be exposed to noise levels of approximately 74 CNEL.

Ambient noise levels greater than 70 dB CNEL in the Project area exceed the levels at which the California Building Standards Code, California Green Building Standards Code, and the General Plan require the preparation of an acoustical analysis documenting compliance with applicable interior noise standards of 45 CNEL in any habitable room (pursuant to the Section 1207.4 of the California Building Code, Part 2, Volume 1) and 50 dBA Leq (1-hour) for any occupied room (pursuant to Section 5.507.4.2 of the California Green Building Standards Code)<sup>1</sup>.

Standard construction techniques and materials are commonly accepted to provide a minimum exterior to interior noise attenuation (i.e., reduction) of 22 to 25 dBA with all windows and doors closed, which would result in interior noise levels of approximately 47 to 50 CNEL dBA for units fronting I-210 and approximately 49 to 52 CNEL for units fronting the METRO Gold Line ROW<sup>2</sup>. Since interior noise levels would continue to exceed applicable City and State standards, this is considered a potentially significant impact.

To ensure potential interior noise levels meet applicable standards, the City shall require all development proposals in the Project area, including the Alexan Foothills Specific Plan, to implement mitigation measure MM NOI-1, which requires the preparation of an acoustical analysis to document compliance with interior noise level requirements. Mitigation measure MM NOI-1 would ensure applicable exterior and interior noise standards are met by new development within the Project area. Thus, this measure would ensure that buildout of the Project would not expose people to noise levels that exceed standards and impacts would be reduced to a less than significant level.

### **Mitigation Measures**

Mitigation Measure MM NOI-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

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<sup>1</sup> Part 2 of the California Building Code, Section 1207, Sound Transmission, establishes sound transmission standards for interior walls, partitions, and floor/ceiling assemblies. Specifically, Section 1207.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room. Chapter 5 of the California Green Building Standards Code, Section 5.507 sets forth environmental comfort/acoustical control requirements for building assemblies that are prescriptive-based (i.e., assemblies meet certain prescribed exterior to interior noise attenuation levels) or performance-based (i.e., the interior noise environment shall not exceed 50 dBA on an hourly equivalent noise level basis in occupied areas. Both the prescriptive and performance standard contained in the Green Building Standards Code apply to projects located within a 65 CNEL noise contour of an airport, freeway, railroad, industrial source, etc. or otherwise exposed to a noise level of 65 dBA on an hourly Leq basis.

<sup>2</sup> The U.S. Department of Housing and Urban Development (HUD) Noise Guidebook and supplement (2009a, 2009b) includes information on noise attenuation provided by building materials and different construction techniques. As a reference, a standard exterior wall consisting of 5/8-inch siding, wall sheathing, fiberglass insulation, two by four wall studs on 16-inch centers, and 1/2-inch gypsum wall board with single strength windows provides approximately 35 dBs of attenuation between exterior and interior noise levels. This reduction may be slightly lower (2-3 dBs) for traffic noise due to the specific frequencies associated with traffic noise. Increasing window space may also decrease attenuation, with a reduction of 10 dBs possible if windows occupy 30% of the exterior wall façade.

**MM NOI-1: Confirm Compliance with Applicable Interior Noise Standard Requirements.**

Prior to the issuance of a building permit for any development in the Project area, the City shall review and approve an acoustical analysis, prepared by or on behalf of the applicant, and based on the final design, that:

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

**Requirements and Timing:** An acoustical report shall be submitted to City Planning for review and approval prior to the issuance of building permits, documenting that actual interior and exterior noise level at the locations indicated in this measure, meet City and State standards.

**Monitoring:** City staff shall approve the acoustical analysis prior to issuance of building permits.

***Project Generation of Noise Levels that Exceed Standards***

Once constructed, the proposed Alexan Foothills Specific Plan and future development in ZCA Areas A and C would generate noise levels from increased vehicle parking activities, stationary sources of equipment such as potential heating, ventilation, and air conditioning (HVAC) equipment, and a back-up generator and fire pump. The potential noise levels generated by these activities and equipment are described below.

***Alexan Foothills Specific Plan Operational Noise Generation***

**Parking Garage Noise.** The proposed Alexan Foothills Specific Plan parking garage would increase the noise levels at the site by providing additional parking capacity, reflection of sound waves, etc. Noise sources associated with the parking garage (e.g., car horns, doors slamming, cars starting, etc.) would be intermittent. These types of noises would not differ substantially from the noise generated by existing parking activities in the Project area, but the frequency of these events would increase. Potential increases in noise resulting from the new parking garage were quantified using the following equations contained in the FTA's *Transit Noise and Vibration Impact Assessment* manual (FTA 2006).



$$\text{Leq}(h) = \text{SEL}_{\text{ref}} + C_N - 36.5$$

and

$$C_N = 10 \times \log(N_A / 1,000)$$

Where:

Leq(h)	=	Hourly Leq at 50 feet
SEL <sub>ref</sub>	=	Source Reference Level at 50 feet
C <sub>N</sub>	=	Volume Adjustment (SEL <sub>ref</sub> is based on 1,000 cars in peak activity hour)
N <sub>A</sub>	=	Number of Automobiles per Hour

To calculate the Leq and CNEL at 50 feet from the parking garage, hourly noise levels were first calculated throughout the day using the equations above, where, according to the FTA, the SEL<sub>ref</sub> for parking garages is 92 dBA. The AM peak hour calculations accounted for 143 hourly trips, the PM peak hour (calculations accounted for 194 hourly trips, and the remaining 1,601 trips were divided evenly throughout the remaining 22 hours in the day (i.e., approximately 73 average trips per hour). This methodology is considered conservative (i.e., likely to overestimate CNEL) since it likely overestimates activity at the parking garage from the hours of 10:00 PM to 7:00 AM, when a 10 dBA penalty is applied to the hourly noise levels used to calculate the CNEL (see Section 16.1).

The results of the calculation indicate the parking garage would result in a worst-case hourly Leq value of 49.3 dBA (during the PM peak hour activity) and a CNEL of 51.8, which is more than 20 dBA lower than the existing ambient noise level measured at LT-2 (75.1 CNEL). In general, when two noise levels are 10 dB or more apart, the lower value does not contribute significantly (less than 0.5 dB) to the total noise level. Thus, potential noise levels from the Alexan Foothills Specific Plan parking garage would comply with the standards contained in Municipal Code Section 9.44.040 and would not result in a substantial increase in ambient noise levels in the vicinity of the Project.

**Mechanical Equipment.** The proposed parking garage would be an open air structure and would not require fresh air supply or exhaust supply fans to provide ventilation throughout the garage.

Mechanical equipment associated with the Alexan Foothills Specific Plan would include pool equipment (e.g., pumps), elevators, and individual HVAC units. Pool and elevator equipment would be contained within mechanical rooms, and the HVAC units necessary to cool and ventilate residential units would be small charge/load units mounted on each rooftop and contained behind a parapet wall that would direct sound upwards. The mechanical equipment associated with the proposed Alexan Foothills Specific Plan would comply with the standards contained in Municipal Code Section 9.44.040 and would not result in a substantial increase in ambient noise levels in the vicinity of the Project.

**Other Operational Noise Sources Including Stationary Noise Sources.** The Alexan Foothills Specific Plan would include ground level and rooftop recreational spaces, resident amenities such as a pet spa and fitness center, refuse collection services, a 50-horsepower emergency generator, and a 50-horsepower emergency fire pump which could be tested approximately one-half hour to one-hour per month.

The Specific Plan's recreational spaces and amenities would provide residents recreation and residential services, including areas to sit, eat, and socialize. This type of anticipated activity is consistent with other land uses in the area and would not result in a substantial increase in noise levels in the immediate area.

Refuse collection services would be congregated in the center of the Specific Plan area, with collection services occurring on West Evergreen Avenue, adjacent to the I-210 and away from sensitive receptors. Thus, refuse collection services would not generate substantial noise levels at noise sensitive receptor locations.

The 50-horsepower back-up generator and 50 hp emergency fire pump would be located within designated mechanical rooms. These pieces of equipment would only be used on an intermittent emergency basis with the exception of regular testing (assumed to be one hour per month). Noise from these pieces of equipment would also be shielded by their enclosures, and therefore, would not exceed noise standards at the locations of residences.

Therefore, operational noise impacts generated by the proposed Alexan Foothills Specific Plan would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### ***Operational Noise Generation in ZCA Areas A and C***

Although a specific development is not proposed at this time, future development in ZCA Areas A and C would be likely to generate noise levels from the same type of sources as the Alexan Foothills Specific Plan. However, the overall noise generating activities in these areas would likely be approximately 80% less than that of the Alexan Foothills Specific Plan, based on potential development capacity in ZCA Areas A and C. As described above, the Alexan Foothills Specific Plan would not generate onsite noise levels that have the potential to exceed City standards or result in a substantial permanent increase in ambient noise levels. Since the ZCA would result in less noise generating activities and equipment than the Alexan Foothills Specific Plan, it would also not have the potential to generate onsite noise levels that have the potential to exceed City standards or result in a substantial permanent increase in ambient noise levels. Therefore, impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### ***Operational Noise Levels Associated with Entire Project***

The potential for noise sources in the Alexan Foothills Specific Plan area and ZCA Areas A and C to combine is limited to two areas where the different properties would abut each other. Otherwise, residential buildings, parking garage, and other structures in the proposed development under the Alexan Foothills Specific Plan, would shield adjacent properties.

The first area would be in the northeast corner of the Project area, near the intersection of South Magnolia Avenue and West Evergreen Avenue. The noise generating activities from the Alexan Foothills Specific Plan in this area would generally be limited to low-speed vehicle noise

associated with vehicles entering and exiting the development, as well as some office and commercial activities associated with the leasing office in this area. Although there is no specific development proposal for this ZCA area (Area C) at this time, because this area is currently an industrial use, sensitive receptors are not expected in this area in the future. Therefore, combined noise levels in this area could only affect receptors R-1A and R-1B, located approximately 60 feet east of the Project, across South Magnolia Avenue.

The second area would be in the interior of the Project area, where the western boundary of the Alexan Foothills Specific Plan abuts the eastern boundary of the ZCA Area A along Mayflower Avenue. The noise generating activities from the Alexan Foothills Specific Plan in this area would generally be limited to use of the secondary recreation courtyard, residential uses, and roof deck activities. Although there is no specific development proposal for ZCA Area A at this time, it is assumed that the noise generating activities from future development in this area would consist of similar noise generating activities. The combined noise levels in this area could only affect the residence located approximately 70 feet south of the Project, across the METRO Gold Line ROW (i.e., sensitive receptor location R-2; see Table 16-3).

The combined noise levels generated by the Alexan Foothills Specific Plan and future development in ZCA Areas A and C, would not be substantially different than the individual noise levels associated with each Project component. As described in Section 16.1.1, when two or more sources of equivalent noise are combined, the resulting increase in noise levels is approximately 3 dB. An increase in 3 dB is barely perceptible by humans and would not be significant. Therefore, this impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT NOI-2: SUBSTANTIAL PERMANENT INCREASES IN AMBIENT NOISE LEVELS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

As described under Impact NOI-1, the proposed Alexan Foothills Specific Plan and other future development in ZCA Areas A and C would not generate noise levels that exceed City standards or result in a substantial permanent increase in noise at or in the Project area.

However, the Alexan Foothills Specific Plan and future development in ZCA Areas A and C would generate traffic that would be distributed onto the local roadway system, potentially increasing noise levels along travel routes. The following analysis evaluates the potential increases in traffic noise levels resulting from the Alexan Foothills Specific Plan, future development of ZCA Areas A and C, and both combined.

Caltrans considers a doubling of total traffic volume to result in a 3 dBA increase in traffic-related noise levels (Caltrans 2013a). If the Project would not result in a doubling of traffic volumes on the local roadway system, it would not result in a substantial permanent increase in traffic-related noise levels. A noise level of less than 3 dBA is typically not perceptible to the human ear in an outdoor environment.

**Alexan Foothills Specific Plan Increases in Traffic Noise Levels**

The TIA identifies that the Alexan Foothills Specific Plan would result in a net increase in trip generation equal to 1,938 vehicle trips (LSA 2018). Tables 16-8 and 16-9 identify the increases in traffic noise levels attributable to the Alexan Foothills Specific Plan under existing (2018) and cumulative (2035) conditions, based on the trip distribution assumptions contained in the TIA.

**Table 16-8 Alexan Foothills Specific Plan Net Change in ADT (Existing 2018)**

ID	Road	Segment	Existing ADT	Existing Plus Specific Plan ADT	Percent Change
1A	Duarte Road	West of Mayflower	21,445	21,545	0.47%
1B	Duarte Road	Mayflower to Magnolia	17,531	17,531	0.00%
1C	Duarte Road	Magnolia to Myrtle	17,531	17,731	1.14%
1D	Duarte Road	East of Myrtle	10,667	10,767	0.94%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,300</b>	<b>2,900</b>	<b>26.09%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,500	2,700	8.00%
3A	Huntington Drive	Mayflower to Magnolia	25,299	25,499	0.79%
3B	Huntington Drive	Magnolia to Myrtle	25,29	25,399	0.40%
4A	Mayflower Avenue	North of Evergreen	15,416	15,716	1.95%
4B	Mayflower Avenue	Evergreen to Duarte	15,236	15,336	0.66%
4C	Mayflower Avenue	South of Duarte	7,200	7,200	0.00%
5A	Magnolia Avenue	Huntington to Evergreen	6,790	7,490	10.31%
5B	Magnolia Avenue	Evergreen to Duarte	6,255	6,755	7.99%
6A	Myrtle Avenue	Huntington to Central	21,331	21,531	0.94%
6B	Myrtle Avenue	Central to Duarte	19,904	19,904	0.00%
6C	Myrtle Avenue	South of Duarte	21,578	21,678	0.46%

Source: LSA 2018 (see Appendix J)

**Table 16-9 Alexan Foothills Specific Plan Net Change in ADT (Future 2035)**

ID	Road	Segment	Future ADT	Future Plus Specific Plan ADT	Percent Change
1A	Duarte Road	West of Mayflower	23,900	24,000	0.42%
1B	Duarte Road	Mayflower to Magnolia	19,700	19,700	0.00%
1C	Duarte Road	Magnolia to Myrtle	19,800	20,000	1.01%
1D	Duarte Road	East of Myrtle	12,100	12,200	0.83%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,500</b>	<b>3,100</b>	<b>24.00%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,700	2,900	7.41%
3A	Huntington Drive	Mayflower to Magnolia	28,600	28,800	0.70%
3B	Huntington Drive	Magnolia to Myrtle	28,500	28,600	0.35%
4A	Mayflower Avenue	North of Evergreen	16,900	17,200	1.78%
4B	Mayflower Avenue	Evergreen to Duarte	16,700	16,800	0.60%

**Table 16-9 Alexan Foothills Specific Plan Net Change in ADT (Future 2035)**

ID	Road	Segment	Future ADT	Future Plus Specific Plan ADT	Percent Change
4C	Mayflower Avenue	South of Duarte	7,900	7,900	0.00%
5A	Magnolia Avenue	Huntington to Evergreen	8,100	8,800	8.64%
5B	Magnolia Avenue	Evergreen to Duarte	7,700	8,200	6.49%
6A	Myrtle Avenue	Huntington to Central	24,900	25,100	0.80%
6B	Myrtle Avenue	Central to Duarte	24,000	24,000	0.00%
6C	Myrtle Avenue	South of Duarte	24,100	24,200	0.41%
Source: LSA 2018 (see Appendix J)					

As shown in Tables 16-8 and 16-9, the Alexan Foothills Specific Plan could result in up to an additional 26% increase in traffic volumes on roadway segments near the Project (West Evergreen Avenue). Since the Alexan Foothills Specific Plan would not double traffic volumes on roadways in the Project vicinity, traffic noise would not increase by 3 dBA. Therefore, this impact is less than significant.

### Mitigation Measures

No mitigation measures are required.

### ZCA Areas A and C Increases in Traffic Noise Levels

The TIA identifies that future development in the ZCA Areas A and C would result in a net increase in trip generation equal to 425 vehicle trips (LSA 2018). Tables 16-10 and 16-11 identify the increases in traffic noise levels attributable to future development in the ZCA Areas A and C under existing (2018) and cumulative (2035) conditions, based on the trip distribution assumptions contained in the TIA.

**Table 16-10 ZCA Areas A and C Net Change in ADT (Existing 2018)**

ID	Road	Segment	Existing ADT	Existing Plus ZCA Areas A and C ADT	Percent Change
1A	Duarte Road	West of Mayflower	21,445	21,545	0.47%
1B	Duarte Road	Mayflower to Magnolia	17,531	17,531	0.00%
1C	Duarte Road	Magnolia to Myrtle	17,531	17,531	0.00%
1D	Duarte Road	East of Myrtle	10,667	10,767	0.94%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,300</b>	<b>2,400</b>	<b>4.35%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,500	2,500	0.00%
3A	Huntington Drive	Mayflower to Magnolia	25,299	25,399	0.40%
3B	Huntington Drive	Magnolia to Myrtle	25,29	25,299	0.00%
4A	Mayflower Avenue	North of Evergreen	15,416	15,416	0.00%
4B	Mayflower Avenue	Evergreen to Duarte	15,236	15,236	0.00%
4C	Mayflower Avenue	South of Duarte	7,200	7,200	0.00%

**Table 16-10 ZCA Areas A and C Net Change in ADT (Existing 2018)**

ID	Road	Segment	Existing ADT	Existing Plus ZCA Areas A and C ADT	Percent Change
5A	Magnolia Avenue	Huntington to Evergreen	6,790	6,990	2.95%
5B	Magnolia Avenue	Evergreen to Duarte	6,255	6,355	1.60%
6A	Myrtle Avenue	Huntington to Central	21,331	21,331	0.00%
6B	Myrtle Avenue	Central to Duarte	19,904	19,904	0.00%
6C	Myrtle Avenue	South of Duarte	21,578	21,578	0.00%

Source: LSA 2018 (see Appendix J)

**Table 16-11 ZCA Areas A and C Net Change in ADT (Future 2035)**

ID	Road	Segment	Future ADT	Future Plus ZCA Areas A and C ADT	Percent Change
1A	Duarte Road	West of Mayflower	23,900	24,000	0.42%
1B	Duarte Road	Mayflower to Magnolia	19,700	19,700	0.00%
1C	Duarte Road	Magnolia to Myrtle	19,800	19,800	0.00%
1D	Duarte Road	East of Myrtle	12,100	12,200	0.83%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,500</b>	<b>2,600</b>	<b>4.00%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,700	2,700	0.00%
3A	Huntington Drive	Mayflower to Magnolia	28,600	28,700	0.35%
3B	Huntington Drive	Magnolia to Myrtle	28,500	28,500	0.00%
4A	Mayflower Avenue	North of Evergreen	16,900	16,900	0.00%
4B	Mayflower Avenue	Evergreen to Duarte	16,700	16,700	0.00%
4C	Mayflower Avenue	South of Duarte	7,900	7,900	0.00%
5A	Magnolia Avenue	Huntington to Evergreen	8,100	8,300	2.47%
5B	Magnolia Avenue	Evergreen to Duarte	7,700	7,800	1.30%
6A	Myrtle Avenue	Huntington to Central	24,900	24,900	0.00%
6B	Myrtle Avenue	Central to Duarte	24,000	24,000	0.00%
6C	Myrtle Avenue	South of Duarte	24,100	24,100	0.00%

Source: LSA 2018 (see Appendix J)

As shown in Tables 16-10 and 16-11, ZCA Areas A and C could result in up to an additional 4.35% increase in traffic volumes on roadway segments near the Project (West Evergreen Avenue). Since potential future development in ZCA Areas A and C would not double traffic volumes on roadways in the Project vicinity, traffic noise would not increase by 3 dBA. Therefore, this impact is less than significant.

## Mitigation Measures

No mitigation measures are required.

### ***Combined Project Increases in Traffic Noise Levels***

The TIA identifies that the Alexan Foothills Specific Plan and potential future development in ZCA Areas A and C would result in a combined net increase in trip generation equal to 2,363 vehicle trips (LSA 2018). Tables 16-12 and 16-13 identify the increases in traffic noise levels attributable to the Alexan Foothills Specific Plan and potential future development in ZCA Areas A and C under existing (2018) and cumulative (2035) conditions, based on the trip distribution assumptions contained in the TIA.

As shown in Table 16-12 and 16-13, the Project could result in up to an additional 30.4% increase in traffic volumes on roadway segments near the Project (West Evergreen Avenue). Since the combined Project development would not double traffic volumes on roadways in the Project vicinity, traffic noise would not increase by 3 dBA. Therefore, this impact is less than significant.

**Table 16-12 Project Net Change in ADT (Existing 2018)**

ID	Road	Segment	Existing ADT	Existing Plus Project ADT	Percent Change
1A	Duarte Road	West of Mayflower	21,445	21,645	0.93%
1B	Duarte Road	Mayflower to Magnolia	17,531	17,531	0.00%
1C	Duarte Road	Magnolia to Myrtle	17,531	17,731	1.14%
1D	Duarte Road	East of Myrtle	10,667	10,867	1.87%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,300</b>	<b>3,000</b>	<b>30.43%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,500	2,700	8.00%
3A	Huntington Drive	Mayflower to Magnolia	25,299	25,599	1.19%
3B	Huntington Drive	Magnolia to Myrtle	25,29	25,399	0.40%
4A	Mayflower Avenue	North of Evergreen	15,416	15,716	1.95%
4B	Mayflower Avenue	Evergreen to Duarte	15,236	15,336	0.66%
4C	Mayflower Avenue	South of Duarte	7,200	7,200	0.00%
5A	Magnolia Avenue	Huntington to Evergreen	6,790	7,690	13.25%
5B	Magnolia Avenue	Evergreen to Duarte	6,255	6,855	9.59%
6A	Myrtle Avenue	Huntington to Central	21,331	21,531	0.94%
6B	Myrtle Avenue	Central to Duarte	19,904	19,904	0.00%
6C	Myrtle Avenue	South of Duarte	21,578	21,678	0.46%

Source: LSA 2018 (see Appendix J)

**Table 16-13 Project Net Change in ADT (Future 2035)**

ID	Road	Segment	Future ADT	Future Plus Project ADT	Percent Change
1A	Duarte Road	West of Mayflower	23,900	24,100	0.84%
1B	Duarte Road	Mayflower to Magnolia	19,700	19,700	0.00%
1C	Duarte Road	Magnolia to Myrtle	19,800	20,000	1.01%
1D	Duarte Road	East of Myrtle	12,100	12,300	1.65%
<b>2A</b>	<b>W. Evergreen Avenue</b>	<b>Mayflower to Magnolia</b>	<b>2,500</b>	<b>3,200</b>	<b>28.00%</b>
2B	W. Evergreen Avenue	Magnolia to Myrtle	2,700	2,900	7.41%
3A	Huntington Drive	Mayflower to Magnolia	28,600	28,900	1.05%
3B	Huntington Drive	Magnolia to Myrtle	28,500	28,600	0.35%
4A	Mayflower Avenue	North of Evergreen	16,900	17,200	1.78%
4B	Mayflower Avenue	Evergreen to Duarte	16,700	16,800	0.60%
4C	Mayflower Avenue	South of Duarte	7,900	7,900	0.00%
5A	Magnolia Avenue	Huntington to Evergreen	8,100	9,000	11.11%
5B	Magnolia Avenue	Evergreen to Duarte	7,700	8,300	7.79%
6A	Myrtle Avenue	Huntington to Central	24,900	25,100	0.80%
6B	Myrtle Avenue	Central to Duarte	24,000	24,000	0.00%
6C	Myrtle Avenue	South of Duarte	24,100	24,200	0.41%

Source: LSA 2018 (see Appendix J)

### Mitigation Measures

No mitigation measures are required.

### IMPACT NOI-3: SUBSTANTIAL TEMPORARY OR PERIODIC INCREASES IN AMBIENT NOISE LEVELS

#### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

The construction of the Alexan Foothills Specific Plan and other future development within ZCA Areas A and C would generate a temporary and periodic increase in ambient noise levels over an approximately two-and-a-half-year period. The construction of the Alexan Foothills Specific Plan is anticipated to occur over an approximately 30-month period between 2020 and 2022, while construction of future development in ZCA Areas A and C is anticipated to occur over a 12-month period between 2021 and 2022. As a conservative approach, this EIR's analysis assumes future development of the ZCA Areas A and C would occur during the final twelve months of the Alexan Foothills Specific Plan construction schedule (i.e., construction activities in the Alexan Foothills Specific Plan and ZCA Areas A and C would occur at the same time). The following analysis first presents the estimated construction noise levels associated with the Alexan Foothills Specific Plan, then the construction noise levels associated with future development in ZCA Areas A and C, and finally the combined noise levels associated with simultaneous development of both Project components.

Demolition of existing buildings as well as erection of new structures associated with the Alexan Foothills Specific Plan and buildout within ZCA Areas A and C would require the use of heavy-



duty, off-road construction equipment throughout development activities. Table 16-14 presents the noise levels associated with typical types of construction equipment that could be used during construction activities.

**Table 16-14 Typical Construction Equipment Noise Levels (dBA)**

Equipment	Reference Noise Level at 50 Feet (L <sub>max</sub> ) <sup>(A)</sup>	Percent Usage Factor <sup>(B)</sup>	Predicted Noise Levels (Leq) at Distance <sup>(C)</sup>					
			50 Feet	100 Feet	150 Feet	250 Feet	350 Feet	450 Feet
Bulldozer	85	40	81	75	71	67	64	62
Backhoe	80	40	76	70	66	62	59	57
Compact Roller	80	20	73	67	63	59	56	54
Concrete Mixer	85	40	81	75	71	67	64	62
Crane	85	16	77	71	67	63	60	58
Excavator	85	40	81	75	71	67	64	62
Generator	82	50	79	73	69	65	62	60
Pneumatic tools	85	50	82	76	72	68	65	63
Scraper	85	40	82	76	72	68	64	62
Delivery Truck	85	40	81	75	71	67	64	62
Vibratory Roller	80	20	73	67	63	59	56	54

Sources: Caltrans 2013a and FHWA 2010.  
 Notes:  
 (A) L<sub>max</sub> noise levels based on manufacturer's specifications.  
 (B) Usage factor refers to the amount of time the equipment produces noise over the time period.  
 (C) Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2009:  $L_{eq} \text{ (hourly)} = L_{max} \text{ at 50 feet} - 20\log(D/50) + 10\log(UF)$ , where: L<sub>max</sub> = reference L<sub>max</sub> from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

**Alexan Foothills Specific Plan Construction Noise Levels**

The Alexan Foothills Specific Plan area is generally located within the center of the overall Project area and extends to the eastern boundary of the site. Parcel 7, located in the northwestern portion of the Project area is identified as ZCA Area C.

Construction activities associated with buildout of the five-story residential buildings and six-story parking structure would generate a variety of noise levels from operation of different kinds of construction equipment. Day-to-day noise levels at individual locations would vary depending on the equipment staging, location of operation, where materials are being stored onsite, and access routes used to import materials. Demolition, site preparation, grading / excavation, building construction, paving, and architectural coating processes involve equipment and vehicles that are known to produce temporary but intrusive levels of noise when operated in close proximity to sensitive residential receptors, particularly if equipment operation occurs during early morning, evening, or nighttime hours.

In general, construction noise levels would be highest during site preparation, grading, and excavation phases, when large pieces of earthmoving equipment would be required. Bulldozers, excavators, and graders would likely be the largest pieces of equipment operating at the same time during these phases. As a conservative approach, it is estimated up to three such pieces of

equipment could be operating concurrently near a property line for an hour or two at a time. At a distance of 50 feet, the hourly Leq noise level associated with operation of a bulldozer, excavator, and grader would be approximately 86 dBA. Table 16-15 summarizes the hourly Leq noise levels that would be generated by the operation of these three pieces of equipment at sensitive receptor locations and compares these estimated noise levels against the existing ambient noise level environment.

**Table 16-15 Alexan Foothills Specific Plan: Estimated Construction Noise Levels**

Receptor	Distance from Construction Activity	Noise Level (dBA)			
		Existing Ambient	Construction	With Barrier Attenuation <sup>(A)</sup>	Change <sup>(B)</sup>
R-1A / 1B	60 ft	63.7 <sup>(C)</sup>	84.2	--	<b>+20.5</b>
R-2	70 ft	63.7 <sup>(D)</sup>	82.9	72.9	+9.2
R-3	260 ft	67.5 <sup>(E)</sup>	71.8	--	+4.3
R-4	70 ft	67.5 <sup>(E)</sup>	82.9	--	<b>+15.4</b>

Source: MIG 2019 (see Appendix I)  
 Notes:

(A) A permanent noise barrier is located along the southern side of the METRO Gold Line, adjacent to receptors represented by R-2. Effective noise barriers can reduce noise levels by 10 to 15 dBA. The attenuation provided by this barrier (assumed to be 10 dBA) has been factored into the estimated noise level at R-2.

(B) Per the criterion outlined in Section 16.2.1, a significant temporary or periodic noise impact would occur if construction activities resulted in an increase of 10 dBA Leq or more at sensitive receptor locations. Bold values indicate an increase of more than 10 dBA above the ambient level.

(C) The Leq value measured at ST-1 is considered representative of ambient conditions at receptor location R-1A and R-1B. Both ST-1 and ST-2 were taken along South Magnolia Ave, along which Receptor R-1A and R-1B are located. Between ST-1 and ST-2, ST-1 had the lowest Leq value recorded, and therefore represents a conservative indication of ambient noise levels at receptor locations east of the Project.

(D) The Leq value measured at ST-1 is considered representative of ambient conditions at the property boundaries of receptor location R-2. Measurements at ST-1, LT-1, and ST-4 were all located along the southern boundary of the Project area, adjacent to the METRO Gold Line. ST-1 had the lowest Leq value recorded, and therefore represents a conservative indication of ambient noise levels at receptor locations south of the Project.

(E) The Leq value measured at ST-4 is considered representative of ambient conditions at receptor locations R-3 and R-4. Both ST-3 and ST-4 were taken along Mayflower Ave, along which Receptors R-3 and R-4 are located. Between ST-3 and ST-4, ST-4 had the lowest Leq value recorded, and therefore represents a conservative indication of ambient noise levels at receptor locations east of the Project.

The values presented in Table 16-15 reflect conservative (i.e., worst-case), yet realistic estimate of potential hourly Leq noise levels. The above estimates assume all equipment is operating at the Project's boundary nearest the receptor location. In actuality, equipment onsite would move around the work area and would generally not be situated at the same location for more than a few hours at a time. Equipment operating further away would produce lower noise levels than those presented. Nonetheless, as shown in Table 16-15, construction activities associated with the Alexan Foothills Specific Plan are anticipated to increase hourly ambient noise levels by 10 dB or more for two or more hours per day, seven days a week, for a period of 12 months or more. This is considered a potentially significant impact.

To reduce noise levels during construction of the Alexan Foothills Specific Plan, the City would require the applicant and/or the applicant's contractors to implement mitigation measure MM NOI-2, which requires preparation of a construction noise plan and implementation of the plan to minimize noise disturbance at adjacent sensitive receptor locations, to establish designated truck routes to minimize noise disturbance associated with deliveries to the site, and to install

noise barriers along the eastern and western perimeters of the Alexan Foothills Specific Plan area to reduce noise levels by a minimum of 11 dBA. These requirements would reduce construction noise levels such that sensitive receptor locations would not be exposed to noise levels in excess of 10 dBA above ambient conditions for more than year. Implementation of this measure would reduce impacts to a less than significant level.

## Mitigation Measures

Mitigation Measure MM NOI-2 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM NOI-2:** To reduce temporary construction noise impacts on adjacent land uses, the applicant or the applicant's construction contractor shall implement the following construction-period noise abatement measures for any development within the Project area:

- *Construction Activity Notification.* All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule for the proposed development. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can enquire about the construction process and register complaints.
- *Noise Disturbance Coordinator.* A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.
- *Construction Traffic.* Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.
- *Equipment Noise Controls:* The applicant and/or its construction contractor shall implement the following equipment noise control measures during all phases of construction:
  - *Mufflers.* All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices (e.g., engine shields).
  - *Equipment Selection.* Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), to the maximum extent feasible.
  - *Provide Electric Hook-Ups.* If feasible, electric hook-ups shall be provided to avoid the use of generators. If electric service is determined to be infeasible for the site, only whisper-quiet generators shall be used (i.e., inverter generators capable of providing variable load
- *Temporary Barriers.* During all demolition and construction activities, one or more physical barriers capable of achieving a minimum reduction in predicated noise levels by 11 dB shall be installed between future development and Magnolia Avenue and Mayflower Avenue, and between the western boundary of the Alexan Foothills Specific

Plan and ZCA Area A. Potential options for achieving this level of attenuation can include, but are not limited to:

- A concrete, wood, or other barrier installed at-grade (or mounted to structures located at-grade, such as K-Rail) along the property line. Such a wall/barrier shall consist of material that has a minimum rated transmission loss value of 21 dB (or equivalent rating) and shall contain no gaps in the structure through which noise may pass.
- Commercially available acoustic panels or other products such as acoustic barrier blankets installed along the property line, building envelope or, if feasible and necessary, at or near sensitive residential receptor areas.
- Any combination of noise barriers and commercial products capable of achieving an 11-dB reduction in construction noise levels at sensitive receptor locations.

**Requirements and Planning:** This measure shall be printed on all construction drawings and included in construction contracts. **Monitoring:** City staff shall ensure that this measure is located on final construction drawings. City staff shall conduct inspections during construction to ensure that measures are implemented.

**Construction Noise Levels in ZCA Areas A and C**

The type of equipment required to buildout ZCA Areas A and C would be similar to those required for the Alexan Foothills Specific Plan. Based on the smaller area of ZCA Areas A and C, it is estimated that only two large pieces of off-road equipment would be needed during the most intensive phases of construction (e.g., bulldozers, graders, excavators) of future development in ZCA Area A, and one large and small piece of equipment (e.g., bulldozer and backhoe) are assumed to be involved in any future redevelopment of ZCA Area C. Table 16-16 summarizes the hourly Leq noise levels that would be generated by construction activities at the nearest sensitive receptor locations in ZCA Areas A and C and compares these estimated noise levels against the existing ambient noise level environment.

**Table 16-16 ZCA Areas A and C: Estimated Construction Noise Levels**

Receptor	Distance from Construction Activity	Noise Level (dBA)			
		Existing Ambient	Construction	With Barrier Attenuation <sup>(A)</sup>	Change <sup>(B)</sup>
R-1A	60 ft	66.2 <sup>(C)</sup>	80.6	--	<b>+14.4</b>
R-2	70 ft	67.5 <sup>(D)</sup>	82.9	72.9	+5.4
R-3	80 ft	67.5 <sup>(E)</sup>	81.7	--	<b>+14.2</b>

Source: MIG 2019

Notes:

- (A) A permanent noise barrier is located along the southern side of the METRO Gold Line, adjacent to receptors represented by R-2. Effective noise barriers can reduce noise levels by 10 to 15 dBA. The attenuation provided by this barrier (assumed to be 10 dBA) has been factored into the estimated noise level at R-2.
- (B) Per the criterion outlined in Section 16.2.1, a significant temporary or periodic noise impact would occur if construction activities resulted in an increase of 10 dBA Leq or more at sensitive receptor locations. **Bold** values indicate an increase of more than 10 dBA above the ambient level.
- (C) The Leq value measured at ST-2 is considered representative of ambient conditions at receptor location R-1A, because the eastern portion of construction associated with the ZCA areas is closest to ST-2.
- (D) The Leq value measured at ST-4 is considered representative of ambient conditions at the property boundaries of receptor location R-2, because ST-4 is the closest measurement location to R-2 in relation to where

**Table 16-16 ZCA Areas A and C: Estimated Construction Noise Levels**

Receptor	Distance from Construction Activity	Noise Level (dBA)		
		Existing Ambient	Construction	With Barrier Attenuation <sup>(A)</sup>
construction activities associated with the western side of the ZCA areas would occur. (E) The Leq value measured at ST-4 is considered representative of ambient conditions at receptor location R-3. Both ST-3 and ST-4 were taken along S Mayflower Ave, along which Receptor R-3 is located. Between ST-3 and ST-4, ST-4 had the lowest Leq value recorded, and therefore represents a conservative indication of ambient noise levels at receptor locations east of the Project.				

As shown in Table 16-16, the estimated construction noise levels attributable to development of ZCA Areas A and C would result in potentially significant impacts at receptor locations R-1A and R-3, whether or not construction associated with ZCA Areas A and C were to occur concurrently with implementation of the Alexan Foothills Specific Plan. Consistent with the discussion presented under the construction noise analysis for the development of the Alexan Foothills Specific Plan, these noise values represent conservative (i.e., worst-case) yet realistic estimate of potential hourly Leq noise levels. In actuality, equipment onsite would move around the work area and would generally not be situated at the same location for more than a few hours at a time. Equipment operating further away would produce lower noise levels than those presented.

Nevertheless, impacts would be potentially significant. Implementation of mitigation measure MM NOI-2 would reduce impacts to less than significant levels.

**Mitigation Measures**

Refer to mitigation measure MM NOI-2.

**Combined Project Noise Levels**

As described previously, the Project being analyzed is the buildout of the Alexan Foothills Specific Plan over an approximately 30-month period, with future development of ZCA Areas A and C potentially occurring during the final 12 months of the Alexan Foothills Specific Plan construction.

Development in the Specific Plan area would be well underway by the time demolition and earthmoving activities would begin in ZCA Areas A and C. The residential buildings and parking garage would likely be into vertical building construction phases by the time site preparation, grading, and/or excavation would begin in ZCA Areas A and C. The types of equipment needed for vertical structure development would generally include a crane, pneumatic tools (e.g., nail gun), and a forklift (similar in terms of horsepower as a backhoe). At a distance of 50 feet, the hourly Leq noise level associated with operation of a crane, pneumatic tool, and forklift would be approximately 84 dBA. Table 16-17 summarizes the hourly Leq noise levels that would be generated by vertical structure development within the Alexan Foothills Specific Plan area, and Table 16-18 presents the worst-case, combined noise level under full buildout of the Project area.

**Table 16-17 Alexan Foothills Specific Plan: Construction Noise Levels (Structure Development)**

Receptor	Distance from Construction Activity	Construction Noise Level (dBA)
R-1A / R-1B	60 ft	82.4
R-2	70 ft	81.0
R-3	260 ft	69.6

Source: MIG 2018 (Appendix I)

**Table 16-18 Combined Construction Noise Levels of the Alexan Foothills Specific Plan and ZCA Areas A and C**

Receptor	Distance from Construction Activity	Noise Level (dBA)			
		Existing Ambient	Construction	With Barrier Attenuation <sup>(A)</sup>	Change <sup>(B)</sup>
R-1A / R-1B	60 ft	66.2 <sup>(C)</sup>	84.6	--	<b>+18.4</b>
R-2	70 ft	67.5 <sup>(D)</sup>	85.1	75.1	+7.6
R-3	80 / 260 ft	67.5 <sup>(E)</sup>	82.0	--	<b>+14.5</b>

Source: MIG 2018 (Appendix I)

Notes:

(A) A permanent noise barrier is located along the southern side of the METRO Gold Line, adjacent to receptors represented by R-2. Effective noise barriers can reduce noise levels by 10 to 15 dBA. The attenuation provided by this barrier (assumed to be 10 dBA) has been factored into the estimated noise level at R-2.

(B) Per the criterion outlined in Section 16.2.1, a significant temporary or periodic noise impact would occur if construction activities resulted in an increase of 10 dBA Leq or more at sensitive receptor locations. **Bold** values indicate an increase of more than 10 dBA above the ambient level.

(C) The Leq value measured at ST-2 is considered representative of ambient conditions at receptor location R-1A and R-1B, because the most affected receptor by construction in the eastern portion of the Project would be across, or near, ST-2.

(D) The Leq value measured at ST-4 is considered representative of ambient conditions at the property boundaries of receptor location R-2, because the most affected receptor south of the Project would have combined noise levels from construction in the Alexan Foothills Specific Plan area and the ZCA areas (on the western side).

(E) The Leq value measured at ST-4 is considered representative of ambient conditions at receptor location R-3, because of ST-3 and ST-4, ST-4 had the lowest Leq value recorded. ST-4 therefore represents a conservative indication of ambient noise levels at receptor locations east of the Project.

As shown in Table 16-18, combined unmitigated construction noise levels could be as high as 18.4 dBA above the existing ambient environment, under a worst-case scenario at sensitive receptor locations R-1A and R-1B. This change is less than the incremental increase identified for R-1A and R-1B (see Table 16-15), which would occur during earthmoving activities associated with development of the Alexan Foothills Specific Plan. As such, implementation of mitigation measure MM NOI-2, which requires a noise barrier be constructed along the eastern and western portions of active construction areas, capable of reducing noise levels by a minimum of 11 dBA, would also ensure that combined, construction noise levels associated with development of the entire Project area would not increase ambient noise levels at sensitive receptor locations by more than 10 dBA during construction activities. With implementation of mitigation measure MM NOI-2, impacts would be reduced to less than significant impacts.

## Mitigation Measures

Refer to mitigation measure MM NOI-2.

## IMPACT NOI-4: EXPOSE PEOPLE TO OR GENERATE EXCESSIVE GROUNDBORNE VIBRATION OR NOISE

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

Buildout of the Project would require the use of heavy construction equipment that could produce groundborne vibration. The following analysis evaluates if construction of the Project would generate excessive groundborne vibration levels. Once operational, development in the Project area would not result in the use of equipment or machinery that could generate significant groundborne vibration. However, the Project is situated adjacent to the METRO Gold Line ROW, and trains travelling within the ROW would generate groundborne vibration. The analysis also evaluates if new residential receptors in the Project area would be exposed to excessive groundborne vibration from the operation of the METRO Gold Line.

### Construction Vibration

There is the potential that site preparation, grading, foundation construction, and other construction activities associated with the Alexan Foothills Specific Plan and other future development in ZCA Areas A and C could result in groundborne vibration that would, at worst case, occur approximately 60 feet from existing structures on South Magnolia Ave (sensitive receptor locations R-1A and R-1B, see Table 16-3). Table 16-19 lists the groundborne vibration levels associated with the potential type of construction equipment that would most likely be required while undertaking construction in the Project area.

**Table 16-19 Estimated Project Construction Groundborne Vibration Levels**

Equipment	Peak Particle Velocity (in/sec) <sup>(A)</sup>			Velocity Decibels (VdB) <sup>(B)</sup>		
	25 feet	60 feet	100 feet	25 feet	60 feet	100 feet
Large bulldozer	0.089	0.034	0.019	87.0	75.6	68.9
Small bulldozer	0.03	0.011	0.007	58.0	46.6	39.9
Loaded truck	0.076	0.029	0.017	86.0	74.6	67.9
Jackhammer	0.035	0.013	0.008	79.0	67.6	60.9

Sources: Caltrans 2013b and FTA 2006.  
 Notes:  
 (A) Estimated PPV calculated as:  $PPV(D) = PPV(ref) * (25/D)^{1.1}$  where  $PPV(D)$  = Estimated PPV at distance;  $PPV(ref)$  = Reference PPV at 25 ft;  $D$  = Distance from equipment to receiver; and  $n$  = ground attenuation rate (1.1 for dense compacted hard soils).  
 (B) Estimated  $L_v$  calculated as:  $L_v(D) = L_v(25 \text{ feet}) - 30 \log(D/25)$  where  $L_v(D)$  = estimated velocity level in decibels at distance,  $L_v(25 \text{ feet})$  = RMS velocity amplitude at 25 f; and  $D$  = distance from equipment to receiver.

As shown in Table 16-19, receptors 60 feet away from construction activities could be exposed to groundborne vibration levels of up to 0.034 in/sec PPV and 75.6 VdB during operation of large bulldozers. Based on Caltrans' transient criteria (see Table 16-6), these vibration levels would be "barely perceptible." Therefore, groundborne vibration levels are not predicted to

exceed Caltrans' vibration damage threshold criteria for historic or older buildings (0.25 in/sec PPV), a threshold considered protective of all nearby buildings, which are presumed to be of more recent construction, and thus, not as susceptible to damage from vibration as older, unreinforced structures. Groundborne vibration from construction activities would also be infrequent and short in duration (lasting a few hours or days as equipment would not operate in the same location for a prolonged amount of time), would not damage buildings or structures, would not result in long-term incompatibility with existing land uses, and would, therefore, not be excessive. Thus, this impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### ***Exposure to Excessive Groundborne Vibration from the METRO Gold Line***

The Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008) requires consideration of potential METRO Gold Line vibration impacts on residential projects located within 300 feet of the Gold Line (EIR Mitigation Measure NOI-B). Accordingly, a discussion of potential METRO Gold Line vibration impacts on development in the Project area is provided below.

The approval of the proposed Alexan Foothills Specific Plan and other future development within ZCA Areas A and C would result in the placement of new, sensitive residential land uses in close proximity to the METRO Gold Line. As explained in Section 7.1, "Existing METRO Gold Line Noise and Vibration Levels," vibration monitoring was not conducted for the Project; however, vibration monitoring was conducted in January 2018 for the Station Square South Specific Plan, an approximately 3.79-acre residential project located approximately 100 feet southwest of the Project (City of Monrovia 2018). The vibration monitoring for the South Station Square project was conducted approximately 525 feet from the Project, at a distance of 20 feet from the track centerline (Veneklassen 2018). The results of the vibration monitoring conducted for the Station Square South Specific Plan indicate groundborne vibration from passing METRO Gold Line trains was below 0.002 in/sec PPV and 65 VdB. These vibration levels are below both the Los Angeles County Vibration Limit of 0.01 in/sec PPV and the FTA's recommended vibration limit of 72 VdB for frequent events where people sleep (see Table 16-4).

The proposed Alexan Foothills Specific Plan and other future development within ZCA Areas A and C would not result in the placement of structures 20 feet or closer to the METRO Gold Line due to the width of the METRO ROW and City zoning setback requirements. Thus, the operation of the METRO Gold Line would not expose people living in the Project area to excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.



## IMPACT NOI-5: AIRPORT-RELATED NOISE LEVELS

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

The closest airport to the Project area is San Gabriel Valley Airport, located approximately 3.7 miles southwest of the Project area. This public airport has one runway and does not generate substantial airport-related noise in the City of Monrovia. Development of the Project would not expose people living or working in the Project area to excessive airport-related noise levels. This impact would be less than significant.

### Mitigation Measures

No mitigation measures are required.

### 16.2.3 Impact Conclusions

Buildout of the Project has the potential to place residents in areas where ambient noise levels exceed City and State standards for interior noise levels due to the proximity of the Project to I-210 and the METRO line. Impacts would be potentially significant, but they would be reduced to less than significant levels with implementation of mitigation measure MM NOI-1, which requires implementation of design features to ensure interior noise standards can be met and an acoustical analysis to confirm that standards can be met.

In addition, construction under buildout of the Alexan Foothills Specific Plan, ZCA Areas A and C, and both have the potential to result in a significant temporary increase in noise at sensitive receptor locations along Mayflower Avenue and Magnolia Avenue or between the western boundary of the Alexan Foothills Specific Plan and ZCA Areas A and C. Mitigation measure MM NOI-2 would require installation of noise barriers to reduce construction noise at sensitive receptor locations, thereby reducing impacts to less than significant levels.

Traffic noise impacts, noise impacts associated with stationary equipment, and vibration impacts would be less than significant.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ADT	Average Daily Traffic
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
dB	Decibel
dBA	Decibels, A-Weighted
dBV / VdB	Velocity Decibels
Ldn / DNL	Day-Night Noise Level
EIR	Environmental Impact Report
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GPA	General Plan Amendment
HVAC	Heating, Ventilation, and Air Conditioning

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
HUD	Department of Housing and Urban Development
Hz	Hertz
Leq	Average / Equivalent Noise Level
Lmax	Maximum Noise Level
Lmin	Minimum Noise Level
LT	Long Term (noise measurement)
METRO	Los Angeles County Metropolitan Transportation Authority
OITC	Outdoor/Indoor Transmission Class
PPV	Peak Particle Velocity
ROW	Right of Way
SEL <sub>ref</sub>	Source Reference Level
ST	Short Term (noise measurement)
STC	Sound Transmission Class
TIA	Traffic Impact Analysis
ZCA	Zoning Code Amendment

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Veneklassen

2018 Station Square Multi-Family Development Monrovia, California Exterior Façade Acoustical Design. Santa Monica, CA. April 3, 2018.

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## **17. POPULATION AND HOUSING**

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This EIR Chapter describes existing population and housing in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project and describes potential impacts that could result from the Project.

### **17.1 SETTING**

The environmental and regulatory setting of the Project area is described based on data provided by the U.S. Census Bureau, the Southern California Association of Governments (SCAG), and the California Department of Finance.

#### **17.1.1 Environmental Setting**

##### **Population**

Monrovia did not experience substantial population and housing growth between 1990 and 2000. According to the U.S. Census Bureau, the City's population was 35,761 in 1990 and grew by 3.3 percent to 36,929 in 2000. The City has continued to grow slowly this century (since 2000). The U.S. Census Bureau (2018) showed the City on Monrovia's population as 36,590 in 2010 (very little change since 2000). The U.S. Census Bureau estimated the City's population of 37,061 in 2017.

Population growth in the City of Monrovia is projected in SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) utilizing a comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans. According to SCAG (2016), the population of Monrovia is anticipated to grow to 40,300 by 2040, while Los Angeles County as a whole is anticipated to add approximately one million residents over the same time frame.

The Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008) notes that the population of the City will increase substantially more (58,805 in 2030) in large part due to the planned development of medium- and high-density residential, and mixed-use developments.

The City's 2014-2021 Housing Element (City of Monrovia 2014) projected that the population of Monrovia would be 37,700 by 2020, using SCAG's projections at that time.

##### **Housing**

The California Department of Finance (2018) reports the number of housing units as 15,010 in the City (2018); in 2010, there were 14,473 housing units in the City. In 2017, over two-thirds (10,431) of the housing units were single detached units; about 3,500 of the units were a part of multiple unit buildings with five or more units.

The City's 2014-2021 Housing Element (City of Monrovia 2014) also reported 14,470 housing units in Monrovia in 2010.

Currently, there is one unoccupied residential unit in the Alexan Foothills Specific Plan area and

four additional single family residences in ZCA Areas A and C.

## **Employment**

The SCAG RTP/SCS (2016) reported employment in Monrovia as 19,700 in 2012 and projected employment as 23,300 in 2040.

The City's 2014-2021 Housing Element (City of Monrovia 2014) reported 17,700 jobs in Monrovia in 2008 and projected 18,200 jobs in 2020 according to SCAG projections at that time.

### **17.1.2 Regulatory Setting**

#### **Housing Element Law (California Government Code Article 10.6)**

State Law requires each City and County to prepare and maintain a current Housing Element as part of the community's General Plan to attain a Statewide Goal of providing "decent housing and a suitable living environment for every California family." Under State Law, Housing Elements must be updated every five years and reviewed by the State Department of Housing and Community Development.

#### **City of Monrovia 2014-2021 Housing Element**

The 2014-2021 Housing Element presents Monrovia's housing plan for the planning period and contains goals, policies, and implementation programs to maintain, preserve, improve, and develop housing for all economic segments of the community (City of Monrovia 2014). The following goals are included in the Housing Element:

- **Goal #1:** Preserve and improve the quality of existing housing and neighborhoods in Monrovia.
- **Goal #2:** Provide adequate housing sites to facilitate the provision of a range of housing types to meet community needs.
- **Goal #3:** Enhance housing affordability so that modest income households can remain an integral part of the Monrovia community.
- **Goal #4:** Reduce governmental constraints on the maintenance, improvement and development of housing while maintaining community character.
- **Goal #5:** Promote equal housing opportunities for all residents, including Monrovia's special needs populations, so that residents can reside in the housing of their choice.
- **Goal #6:** Promote a healthy and sustainable Monrovia through support of existing and new housing which minimizes reliance on natural resources and automobile use.

## **17.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to population and housing that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for the proposed GPA and ZCA Areas A and

C and a project-level analysis was conducted for the proposed Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **17.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items XIV (a) through (b), implementation of the Project would have a significant impact related to population and housing if it would:

- (a) Induce substantial unplanned population growth either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); or
- (b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

### **17.2.2 Analysis Methodology**

The population increase projected under the Project was compared with both SCAG's growth projection for the City from the 2016 RTP/SCS and what is anticipated under the Monrovia General Plan. The anticipated change of employment levels was also considered and compared.

### **17.2.3 Environmental Impacts**

#### **IMPACT POP-1 INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

A total of five existing single family residences occur in the Project area. According to the U.S. Census Bureau (2018), the average household size in Monrovia is 2.77 persons. Therefore, the current estimated population in the Project area is approximately 14 people.

A 436-unit, five-story apartment complex would be constructed in the Alexan Foothills Specific Plan area. According to the U.S. Census Bureau, the average persons per bedroom in Monrovia is 1.536. Given this, the Specific Plan area is anticipated to accommodate approximately 942 residents based on the number and types of units included in the Specific Plan area.

For ZCA Areas A and C, it was determined that up to 82 housing units could be accommodated based on a permitted land use density of 54 units/acre. Using the U.S. Census Bureau's (2018) average household size in Monrovia of 2.77 persons, this would result in approximately 227 residents at full buildout of ZCA Areas A and C. In total, the Project could result in housing for 1,169 new residents. Statistics are provided in Table 17-1.

**Table 17-1 Population Growth Expected from the Project**

Project Component	Type of Unit	Number of Units	Number of Bedrooms	Persons per Bedroom <sup>(A)</sup>	Expected Residents
Alexan Foothills Specific Plan	Studios	20	20	1.536	31
	1 bedroom	254	254	1.536	390
	2 bedroom	147	294	1.536	452
	3 bedroom	15	45	1.536	69
	<b>Subtotal</b>				
ZCA Areas A and C	<b>Max Number of Units</b>		<b>Persons per Unit<sup>(B)</sup></b>		<b>Expected Residents</b>
	82		2.77		227
<b>Total of Full Buildout</b>					<b>1,169</b>
Notes: (A) Average persons per bedroom in Monrovia is 1.536 (B) Average household size in Monrovia is 2.77 persons					

The U.S. Census Bureau (2018) estimated the City's population of 37,061 in 2017. As discussed above, SCAG (2016) projects the City of Monrovia's population to increase to 40,300 in 2040 (an 8.7 percent increase). The Monrovia General Plan Proposed Land Use and Circulation Elements EIR (2008) notes that the population of the City will increase substantially more (to 58,805 by 2030); this would represent nearly a 60 percent increase compared to the 2017 population. The population increase associated with the Project (1,169 residents) represents about a 3% increase in the City's current population. This represents about one-third of the total anticipated population increase anticipated under the SCAG 2016 RTP/SCS and about 5 percent of the projected population increase under the Monrovia General Plan Proposed Land Use and Circulation Elements EIR. A total of 518 dwelling units would also represent an 3% increase in the number of dwelling units in the City in 2018 (based on 15,010 dwelling units present in 2018) (Department of Finance 2018).

The population increase as a result of the Project is generally consistent with the projected increase in density and increase in transit-oriented development anticipated in the Monrovia General Plan Proposed Land Use and Circulation Elements EIR (2008) as well. The EIR states the following: "...land designated for housing will in many places be developed at a higher density than what was typical in the past in the focus areas, thus providing housing for a greater number of people per acre and providing transit-oriented development opportunities (p. 3.8-3)." The EIR goes on to state that this growth does not qualify as a significant impact to population and housing, in part due to the growth management policies and environmental regulations established by the City, as well as the State and Federal governments. This Project is similar to the types of projects considered in the Land Use and Circulation Elements.

In addition, because buildout of the Project would still remain within the amount of growth projected in SCAG's 2016-2040 RTP/SCS for Monrovia, the Project would be consistent with the RTP/SCS.

Therefore, the Project would not induce substantial population growth in the area, and impacts would be less than significant.



## Mitigation Measures

No mitigation measures are required.

## IMPACT POP-2 DISPLACE PEOPLE OR HOUSING

### GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan

The Project area contains a total of five residences, only one of which is planned for demolition under the Alexan Foothills Specific Plan. It is unknown at this time whether the other four residences would be removed as a result of future buildout in ZCA Areas A and C. However, even if all four residences within ZCA Areas A and C are removed, the Project would not result in displacement of a substantial number of residences given the small number of residences in the Project area.

In addition, the estimated existing population in the Project area, including residents, employees, churchgoers, etc., is 188 (see Chapter 11, Greenhouse Gas Emissions and Energy Consumption) with 133 people estimated in the Alexan Foothills Specific Plan area and 55 people estimated in the /ZCA Areas A and C. It is expected that this number of individuals would likely be able to work in nearby areas within the City without the need to find new housing and relocate. In addition, there would be a short-term increase in construction jobs during Project construction. Therefore, the Project is not anticipated to displace a substantial number of workers such that construction of replacement housing would be required. Impacts would be less than significant.

## Mitigation Measures

No mitigation measures are required.

### 17.2.4 Impact Conclusions

The increase in dwelling units and population under the Project would be consistent and within projections in SCAG's RTP/SCS and the City's General Plan. Implementation of the Project would also not result in the displacement of a substantial number of dwelling units and/or people, but rather, would result in a substantial net gain in the amount of housing in the community. Impacts would be less than significant.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
EIR	Environmental Impact Report
GPA	General Plan Amendment
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
ZCA	Zoning Code Amendment

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## **18. PUBLIC SERVICES AND RECREATION**

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This EIR Chapter describes existing conditions for fire protection and emergency medical services, police protection, public schools, parks and recreation, and other public facilities serving the Project area, including libraries. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

### **18.1 SETTING**

The environmental and regulatory setting of the City of Monrovia with respect to public services and recreation is described on the City of Monrovia Public Works website (City of Monrovia 2018a). The website details the streets, parks, utilities, facilities, engineering, and environmental services the City provides, a description of the setting, and is located at:

<http://www.cityofmonrovia.org/your-government/public-works/about-us>

#### **18.1.1 Environmental Setting**

##### **Fire Protection and Emergency Medical Services**

The Monrovia Fire and Rescue Department (MFRD) is the primary provider of fire protection, fire suppression, and emergency medical services in the City, although mutual and automatic aid agreements with neighboring cities and the Los Angeles County Fire Department. MFRD serves Monrovia's residents over approximately 13.7 square miles. The MFRD has two (2) Fire Stations:

- **Station 101** – Located at 141 E. Lemon Avenue in Monrovia. This is the MFRD Headquarters location.
- **Station 102** – Located at 2055 S. Myrtle Avenue in Monrovia.

MFRD states that “it takes between 3-5 minutes for engines to arrive after a 9-1-1 call is received for a fire or medical emergency” (City of Monrovia 2018b).

##### ***Wildland Fire***

The City of Monrovia's Safety Element states “The greatest fire danger to the City is from wildland urban interface, where homes meet the 30- to 50-year brush growth” (City of Monrovia 2002). “The major fire threat exists in the steeper slopes of the San Gabriel Mountains to the north and their potential to sweep into the hillsides and residential foothill developments.” This wildland urban interface in the northern part of developed Monrovia is the only land mapped as a High Fire Hazard Zone within the Safety Element. The Project area is separated from the High Fire Hazard Zone mapped in the Safety Element by approximately two miles of continuous development.

Likewise, the Project area is located approximately two miles from Very High Fire Hazard Severity Zones mapped by CalFIRE (Figure 18-1). The Project area is not within or adjacent to any areas of statewide responsibility mapped by CalFIRE as well.

## Police Protection

The Monrovia Police Department (MPD) provides police services in the Project area with the headquarters building located on 140 East Lime Avenue (about 1.5 miles north of the Project area) (City of Monrovia 2018c). The Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008) projects that the population of Monrovia would be approximately 58,805 total residents by 2030. The EIR notes that higher density development under the General Plan will result in an increased number of calls, however, it will not increase the response times in the City, inclusive of the Project area.

## Schools

The Project area is served by the Monrovia Unified School District; the district operates one pre-school, five elementary schools, two middle schools, one traditional high school, and one alternative high school (Table 18-1). The Monrovia Unified School District had a total of 5,563 students enrolled in 2017 to 2018 (California Department of Education 2018).

**Table 18-1: Schools and Enrollment in Monrovia**

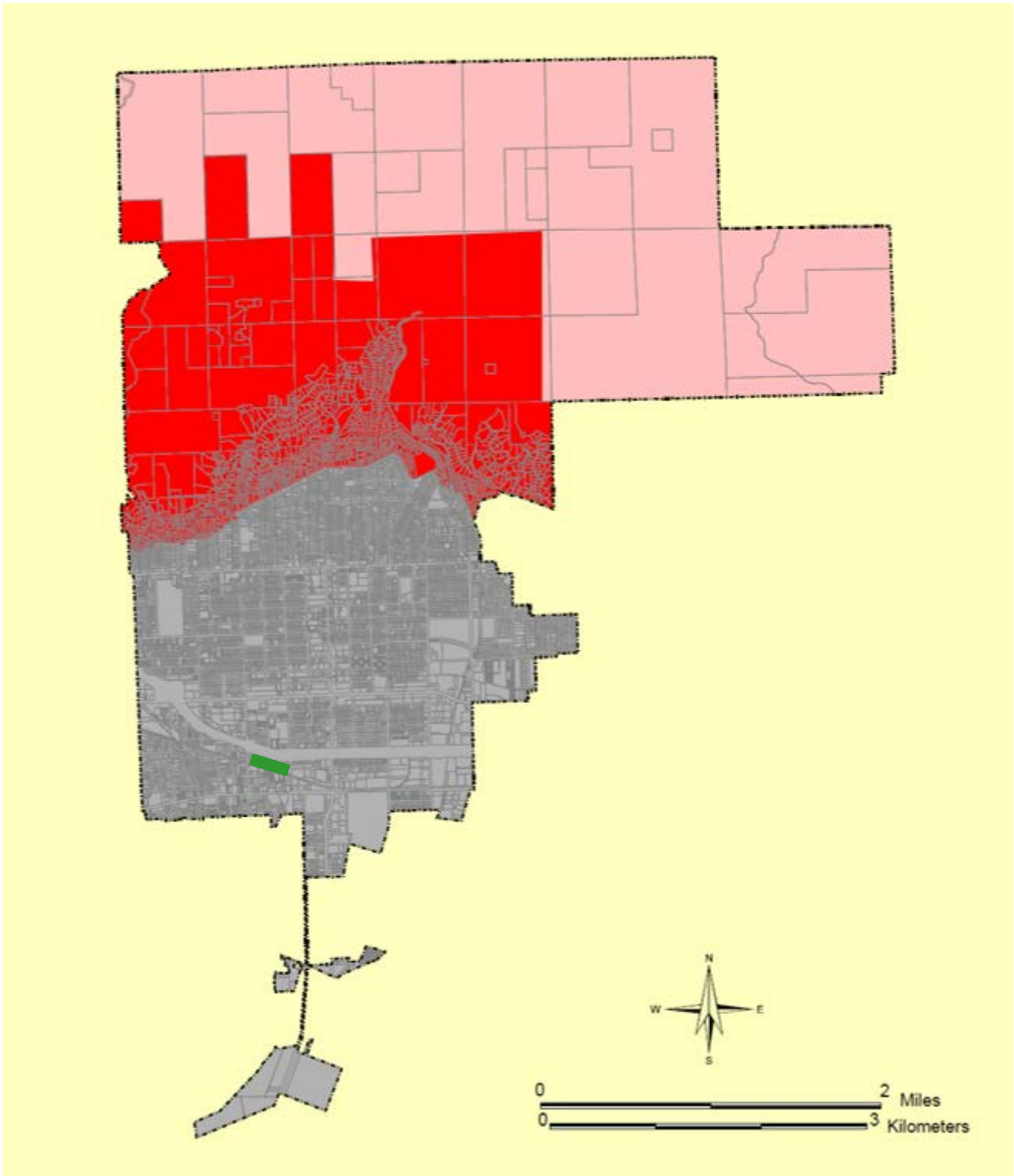
School Name	Enrollment 2017-2018	District
Bradoaks Elementary School	462	Monrovia Unified School District
Mayflower Elementary School	524	
Monroe Elementary School	651	
Plymouth Elementary School	450	
Wild Rose Elementary School	444	
Clifton Middle School	682	
Santa Fe Computer Magnet School	527	
Monrovia High School	1,689	
Canyon Oaks High School	84	
Mountain Park School	35	
Non-Public Non-Sectarian Schools (i.e., Canyon Early Learning Center, Monrovia Community Adult School)	15	
<b>Total</b>	<b>5,563</b>	

Source: California Department of Education (2018)

## Parks and Recreation

### City of Monrovia

The City of Monrovia has eight (8) parks that provide a wide array of recreation opportunities for the residents of, and visitors to, the City (City of Monrovia 2018e). Table 18-2 shows the parks, their locations and number of acres the parks cover. Overall, the City manages just over 112 acres of parklands (developed and undeveloped). The largest park is Monrovia Canyon Park, which is primarily open space with hiking trails totaling 80 acres.



Source: CAL FIRE

### Fire Hazard Severity Zones

Local Responsibility Area

- VHFHSZ
- Non-VHFHSZ

State or Federal Responsibility Areas

- VHFHSZ
- Non-VHFHSZ

City Boundary

Parcels

County Boundary

Project Site

**Figure 18-1** Monrovia Very High Fire Hazard Severity Zone Map

PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

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The City also owns and manages the Hillside Wilderness, totaling over 1,416 acres of conserved natural area. Los Angeles County Parks maintains regional recreational facilities in adjacent communities, including Arcadia Community Regional Park, the Arboretum and Botanical Garden in Arcadia, and Pamela County Park in Duarte. Finally, Monrovia is adjacent to the Angeles National Forest, which provides thousands of acres of outdoor recreation opportunities.

**Table 18-2: Parklands in Monrovia**

<b>Park Name</b>	<b>Location</b>	<b>Acres(A)</b>
1. Julian Fisher Park	915 S. California Avenue	1.2
2. Kiwanis Park	340 N. Grand Avenue	3.5
3. Lucinda Garcia Park	502 W. Olive Avenue	1.5
4. Recreation Park	620 S. Shamrock Avenue	18.9
5. Rotary Park	401 S. California Avenue	0.9
6. Station Square Park	1629 S. Myrtle Avenue	1.7
7. Monrovia Canyon Park	1200 N. Canyon Boulevard	80
8. Library Park	321 S. Myrtle Avenue	4.6
<b>Parks Total</b>	<b>32.3 – Developed Parkland</b> <b>80 – Undeveloped Parkland</b> <b>112.3 – Total Parkland</b>	
Notes: Developed acres consist of parklands that have been improved including outdoor sports fields, turf fields, playgrounds, and other similar recreational amenities.		
(A) Acreages were obtained from Google Earth/ArcGIS, in conjunction with the Citywide Parks Master Plan (City of Monrovia 2018f).		

### **Los Angeles County**

In 2016, Los Angeles County conducted a Park Needs Assessment for communities with the County (Los Angeles County Department of Parks & Recreation 2016). Communities were ranked from “very high” park need to “very low” based on five factors: (1) park acreage per 1,000 people; (2) percentage of population within ½ mile of a park; (3) population density around parks; (4) amenities available at the parks; and (5) park condition. The community of Monrovia was classified as having a “low park need,” and it should be noted that the assessment did not consider Monrovia Canyon Park or the Hillside Wilderness.

### **Libraries and Community Facilities**

Monrovia Public Library is located at 321 S. Myrtle Avenue. Ten full-time and 19 part-time employees operate the library (City of Monrovia 2017). The Library Manager oversees the overall operation and an annual budget of around \$1.68 million. The Monrovia Public Library enriches lives by fostering life-long learning. This is achieved by ensuring every member of the community has access to a range of ideas and information, in a variety of formats, to meet the educational, informational, and recreational needs of the community. The library is a place for the community to meet, discover, and learn.

### **18.1.2 Regulatory Setting**

#### **Fire Protection and Emergency Medical Services**

##### ***California Fire Code (Title 24, Part 9, California Code of Regulations)***

The 2016 California Building Code (CBC) became effective January 1, 2017, including Part 9 of Title 24, the 2016 California Fire Code. The California Fire Code incorporates the Uniform Fire Code with necessary California amendments. This Code prescribes regulations consistent with nationally recognized good practices for the safeguarding, to a reasonable degree, of life and property from the hazards of fire. It also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; conditions hazardous to life or property in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel. The CBC requires that new buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency in a Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted, comply with all sections of the Chapter.

##### ***California Health and Safety Code (Sections 13000 et seq.)***

This Code establishes State fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

##### ***City of Monrovia General Plan, Safety Element***

The following policies from the Safety Element are relevant to fire services and the Project:

- **Policy 3.1.2** - 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 xerophytic materials shall be selected wherever feasible. (Fire Department approval required).
- **Policy 3.1.3** - 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.
- **Policy 3.1.5** - New roofs shall be class "All non-flammable materials."
- **Policy 3.1.7** - 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.
- **Policy 3.2.1** - Enforce installation of fire alarm systems and or sprinklers to provide protection to life and property.



- **Policy 3.2.2** - Enforce regulations requiring smoke detectors in all structures.

## **Police Protection**

### ***City of Monrovia General Plan, Safety Element***

- **Objective 4.1** - Maximize the efficiency of City's Office of Emergency Services (O.E.S.) System

## **Schools**

### ***Education Code Section 17620***

Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. These fees can be collected without special City or County approval, to fund the construction of new school facilities necessitated by the impact of residential and commercial development activity. In addition, these fees can also be used to fund the reconstruction of school facilities or reopening schools to accommodate development-related enrollment growth. Fees are collected immediately prior to the time of the issuance of a building permit by the City or the County.

### ***Leroy F. Green School Facilities Act (1998)***

California Government Code Section 65995 (The Leroy F. Green School Facilities Act of 1998) sets base limits and additional provisions for school districts to levy development impact fees and to help fund expanded facilities to house new pupils that may be generated by the development project. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. These fees may be adjusted by the District over time as conditions change.

## **Parks and Recreation**

### ***State Public Park Preservation Act (California Public Resource Code Section 5400 – 5409)***

The State Public Park Preservation Act is the primary instrument for protecting and preserving parkland in California. Under the act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This ensures a no net loss of parkland and facilities.

### ***Quimby Act (1975)***

The Quimby Act allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements, or pay in lieu fees towards parklands.

## **Library Services**

There are no Federal, State, or local mandatory regulations that pertain to library services.

## 18.2 ENVIRONMENTAL EFFECTS

This Section describes potential impacts related to public services and recreation that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for t ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **18.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items XV (a), and XVI (a) and (b), implementation of the Project would have a significant impact related to public services, as well as recreation, if it would:

#### **Public Services (Item XV):**

- (a) 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- Fire Protection and Emergency Medical Service
- Police Protection
- Public Schools
- Parks
- Libraries or other Public Facilities

#### **Recreation (Item XVI):**

- (b) 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;
- (c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

In addition, based on the CEQA Guidelines, Appendix G: Items IX (f) and (g), and XX (a) through (d), implementation of the Project would have a significant impact related to wildland fire management if it would:

#### **Hazards (Item IX):**

- (f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan (see also Appendix G: Items XX [a]); or
- (g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

In addition, for areas located in or near state responsibility areas or lands classified as very high fire hazard severity zones, based on the CEQA Guidelines, Appendix G: Items XX (b) through (d), implementation of the Project would also have a significant impact related to wildland fire management if it would:

**Wildland Fire (Item XX):**

- (b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- (c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- (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.

**18.2.2 Environmental Impacts**

**IMPACT PS-1 FIRE PROTECTION SERVICES**

**GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The increase in population of 1,169 residents associated with full buildout of the Project could result in an increase in the number of EMS calls in the service area. However, applicants would be required to pay development impact fees listed as standard condition SC PS-1 below, commensurate with the proposed scale of development, prior to receipt of building permits. Therefore, impacts on fire protection services would be less than significant.

***Alexan Foothills Specific Plan***

The MRFD staff have reviewed and commented on the Alexan Foothills Specific Plan and proposed development along with City staff review to ensure proper access and response times to the area. The Specific Plan has been designed to be consistent with the MRFD's required development standards and the MRFD review and approval of plan sets during plan check conducted during the building permit process. The Specific Plan Project does not include any component, such as a road closure, that would extend response times within the City. The streets around the Project would continue to be open and allow for emergency vehicles to pass unimpeded and thus would not increase response times. Therefore, the Alexan Foothills Specific Plan would have a less than significant impact on fire protection services with implementation of SC PS-1 as well.

**Standard Conditions**

Standard Condition SC PS-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM PS-1: Parkland Dedication Fee.** Prior to the issuance of building permits, the applicant shall pay an in-lieu park impact fee to provide for parkland resources consistent with General Plan policy of three acres of parkland per 1,000 residents, or a CFD shall be established along with the approval of the special tax set at the amount established by the City. This fee either shall be paid directly to the City or shall be incorporated into a Community Facilities District fee to be paid by the applicant. **Requirement and Timing:** The in-lieu fee shall be paid to the City, or the establishment of the CFD along with the approval of the special tax set at the amount established by the City shall occur prior to issuance of building permits. **Monitoring:** City staff shall confirm payment of the in-lieu fee or the establishment of the CFD and the approval of the special tax prior to issuance of building permits or the recording of the final parcel map.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT PS-2 POLICE SERVICES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Similar to fire protection services, the Project is not anticipated to increase response times; however, the number of calls for police services could increase over time with buildout given the anticipated population increase of 1,169 residents. However, because the Project would result in overall population growth consistent with the City's General Plan, impacts on police services are anticipated to be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT PS-3 SCHOOL SERVICES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

According to the Monrovia Unified School District service maps, the Project area would be served by Wild Rose Elementary School, Santa Fe Middle School, and Monrovia High School. The Project would result in incremental population growth and potential associated growth in the student population within the Monrovia Unified School District.

The U.S. Census Bureau Community Survey estimates that 17% of the population of Monrovia is between the ages of five and 19 (roughly the ages of the K-12 population; U.S. Census Bureau 2016). The Project is estimated to house 1,169 new residents: 942 under the Alexan Foothills Specific Plan and 227 under ZCA Areas A and C. Using this as an assumption, the Project would add 199 youth in the K-12 age range to the Monrovia Unified School District facilities; 160 of these students would be from the Alexan Foothills Specific Plan and 39 of these students would be anticipated from ZCA Areas A and C. This would result in a maximum estimate of 12.3 students per grade from the Alexan Foothills Specific Plan and 3 students per grade from ZCA Areas A and C.

Table 18-3 summarizes the projected addition of students to each school serving the Project area.

**Table 18-3 Projected Additional Students under Alexan Foothills Specific Plan and ZCA Areas A and C**

School	New Students from the Alexan Foothills Specific Plan	New Students from ZCA Areas A and C
K-5 Wild Rose Elementary	74	18
Grades 6-8 Santa Fe Middle School	37	9
Monrovia High School	49	12
<b>Total</b>	<b>160</b>	<b>39</b>

The estimated number of students from the Alexan Foothills Specific Plan is a high estimate given the relatively large number of studios and one-bedroom units which would likely house single residents or couples with no children. Additionally, some parents or guardians would likely send their children to private schools. In addition, the number of new students would be introduced to area schools over time.

According to the Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008), "...the City acknowledges that new development will increase demand on school facilities, the City is precluded by Senate Bill 50 (SB 50, also known as Proposition 1A, codified in Government Code Section 65995) from considering this a significant impact for the purposes of CEQA...the environmental impacts of construction and operation of additional school facilities will be evaluated by the Monrovia Unified School District when planning for the construction of new or expanded school facilities." The Monrovia Unified School District did not submit comments during the scoping period for the EIR, nor did the School District respond to requests for information during preparation of this EIR. The Project could cause nearby schools to near or exceed capacity. Impacts would be potentially significant and adverse. However, in accordance with California Government Code and the Monrovia Unified School District and as indicated in standard condition SC PS-2, applicants must pay standard school facility development impact fees to offset any incremental impacts of buildout of the Project on existing school facilities. According to AB 2926, payment of development impact fees constitutes full mitigation for impacts to school facilities. Therefore, impacts to the school facilities would be less than significant with implementation of this condition.

**Standard Conditions**

Standard Condition SC PS-2 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**SC PS-2:** Prior to the issuance of building permits, a Project applicant shall pay school facility development impact fees to the Monrovia Unified School District. Proof of payment shall be provided to the City of Monrovia. **Requirement and Timing:** Development impact fees shall be paid prior to issuance of building permits. **Monitoring:** City staff shall confirm payment of development impact fees prior to issuance of building permits.

## **Mitigation Measures**

No mitigation measures are required.

## **IMPACT PS-4 PARKS AND RECREATION**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project, including the Alexan Foothills Specific Plan, does not include active recreational facilities for the public and could increase use of offsite recreational facilities, although the Alexan Foothills Specific Plan does include some public open space in the form of public plazas (see open space plan contained in Appendix M). The public open space provided by the Alexan Foothills Specific Plan would partially reduce the need for use of offsite recreational facilities. However, it is anticipated that an increase in the use of offsite recreational facilities by residents of the Project would still occur as compared to baseline conditions. This would be considered a potentially significant impact.

As a part of mitigation for the Monrovia General Plan Proposed Land Use and Circulation Elements (City of Monrovia 2008), the following measure was included in the EIR:

**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.

Buildout of the Project would be subject to this requirement. Under the Alexan Foothills Specific Plan, this would equate to 2.83 acres of new parkland. The Citywide Park Master Plan (City of Monrovia 2018f), discusses future potential park acquisitions to provide parks in neighborhoods currently underserved. Seven areas in the City are identified, ranging from 0.5 to 1.0 acres in size; the plan also identifies a potential new recreational facility as the Peck Lake Wetlands Project. The Master Plan discusses partnering with Monrovia Unified School District to improve school facilities to also meet local recreational needs.

Alternatively, the City would accept payment of in lieu fees or the formation of a Community Facilities District and payment of special tax as an option to fund City acquisition of parkland to mitigate for the potential increased demand on recreational facilities.

As such, mitigation measure MM PS-1 is required to reduce impacts on recreation to below a significant level.

### **ZCA Areas A and C**

Future development of ZCA Areas A and C would also likely result in an increase in use of offsite recreational facilities.

## **Mitigation Measures**

Mitigation Measure MM PS-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM PS-1: Parkland Dedication Fee.** Prior to the issuance of building permits, the applicant shall pay an in-lieu park impact fee to provide for parkland resources consistent with General Plan policy of three acres of parkland per 1,000 residents, or a CFD shall be established along with the approval of the special tax set at the amount established by the City. This fee either shall be paid directly to the City or shall be incorporated into a Community Facilities District fee to be paid by the applicant. **Requirement and Timing:** The in-lieu fee shall be paid to the City, or the establishment of the CFD along with the approval of the special tax set at the amount established by the City shall occur prior to issuance of building permits. **Monitoring:** City staff shall confirm payment of the in-lieu fee or the establishment of the CFD and the approval of the special tax prior to issuance of building permits or the recording of the final parcel map.

## **IMPACT PS-5 LIBRARY SERVICES AND PUBLIC FACILITIES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project would result in population growth that would incrementally affect other public services such as libraries. Any incremental impact would be addressed through payment of parcel taxes (i.e., approximately \$62 per year per residential unit). These tax dollars would appropriately support library services in the City and a less than significant impact would occur.

#### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT PS-6 WILDLAND FIRE MANAGEMENT**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project is not located in or near a state responsibility areas or lands classified as a very high fire hazard severity zone. In addition, the Project is surrounded by development on all sides for miles, and buildout of the Project would comprise dense development, therefore resulting in minimal risk of exposure to, or generation of, wildland fires. Therefore, the Project would not increase the risk of wildland fires in these areas and impacts would be less than significant.

#### **Mitigation Measures**

No mitigation measures are required.

### **18.2.3 Impact Conclusions**

With implementation of mitigation measure MM PS-1, and payment of development impact fees (standard conditions) by Project applicants, or the establishment of a Community Facilities District and the approval of a special tax, impacts on public services and recreation would remain less than significant or reduced to less than significant levels. Also, the Project would not increase the risk of wildland fires in these areas and impacts would be less than significant.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AB	Assembly Bill
CBC	California Building Code
EIR	Environmental Impact Report
EMS	Emergency Medical Services
GPA	General Plan Amendment
MPD	Monrovia Police Department
MFRD	Monrovia Fire and Rescue Department
OES	Office of Emergency Services
SP	Specific Plan
ZCA	Zoning Code Amendment

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## **19. TRANSPORTATION AND CIRCULATION**

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This EIR Chapter describes the existing setting for transportation and circulation in the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

The Traffic Impact Analysis (TIA), prepared by LSA (May 2018), is included in Appendix J of this EIR, including an addendum prepared in 2019 (LSA 2019). The TIA is the source of the impact evaluation and mitigation measures described in this EIR Chapter. In the TIA, the “Project” and “cumulative (2022) conditions” scenarios involve construction and operation of the Alexan Foothills Specific Plan only, whereas the “future year 2035 conditions – program scenario” represent implementation of the Alexan Foothills Specific Plan plus ZCA Areas A and C. The “future year 2035 conditions – program scenario,” therefore, represents the full Project.

### **19.1 SETTING**

The environmental and regulatory setting of the City of Monrovia with respect to transportation and circulation is described in the Circulation Element of the Monrovia General Plan (2012). Pursuant to CEQA Guidelines Section 15150 (Incorporation by Reference), this document is incorporated into the EIR by reference. The General Plan Circulation Element is available for download from the City’s website at:

<http://www.cityofmonrovia.org/home/showdocument?id=1476>

#### **19.1.1 Environmental Setting**

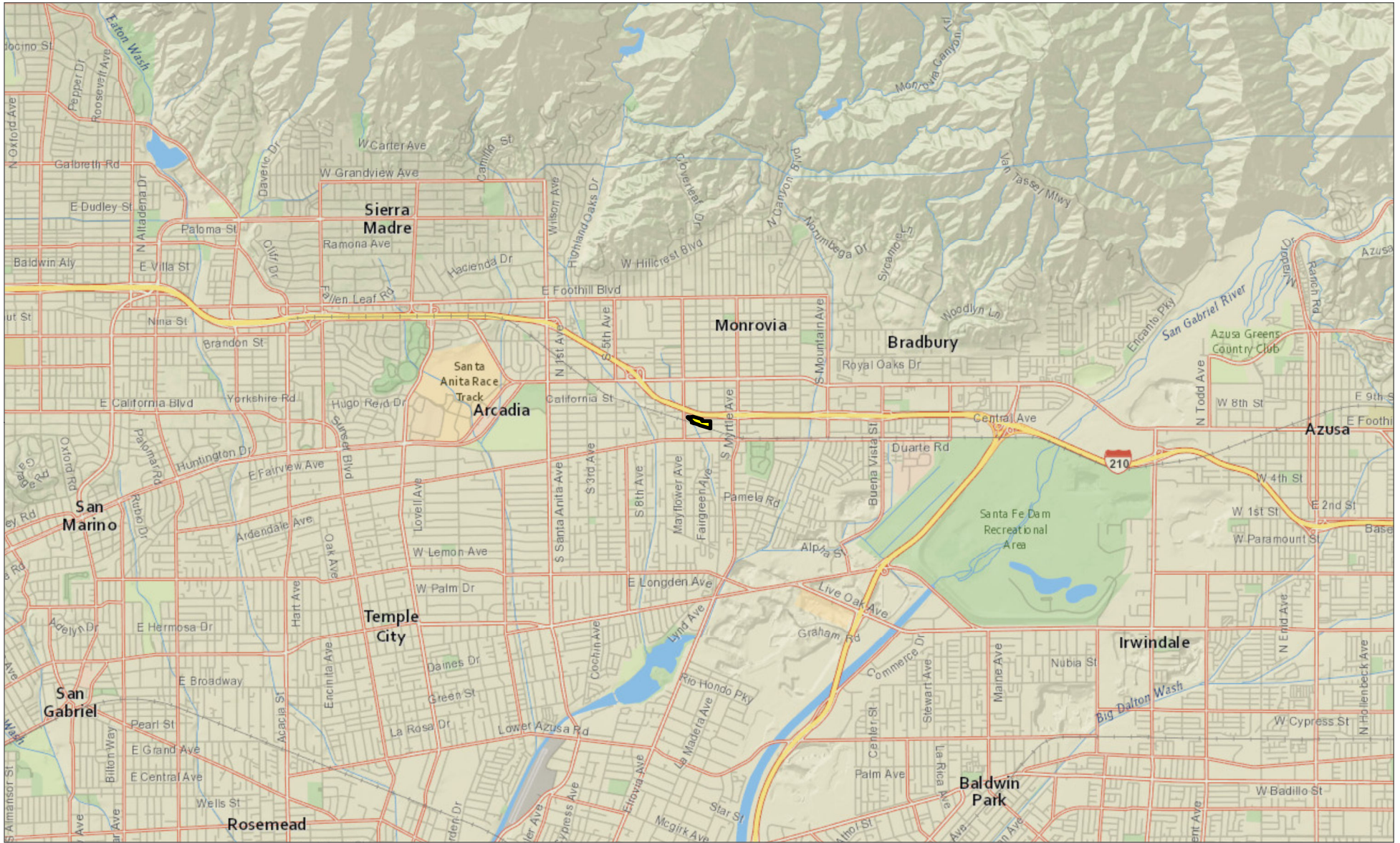
##### **Regional Transportation**

The City of Monrovia is located in the San Gabriel Valley of Los Angeles County (Figure 19-1, Regional Vicinity). The City is connected to the regional transportation network by Interstate-210 (I-210), which crosses the southern portion of the City in an east-west direction.

I-210 runs between eastern and northern San Fernando Valley and San Bernardino County. I-210 has five lanes in each direction in the portion through Monrovia. A full interchange (i.e., providing access in all directions) is located near the western edge of Monrovia at Huntington Drive. Full interchanges are also located at Myrtle Avenue and at Mountain Avenue, which are connected by the one-way frontage roads of Evergreen Avenue and Central Avenue.

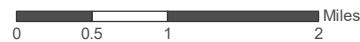
Interstate-605 (I-605) is a north-south freeway approximately 1.5 miles east of Monrovia. This freeway runs between the northeastern San Gabriel Valley (the City of Duarte) and the City of Long Beach in southeast Los Angeles County. The segment of I-605 closest to Monrovia has four lanes in each direction. The freeway has a northern terminus at Huntington Drive and an interchange with the eastbound and westbound I-210. Partial interchanges are located east of Monrovia, at Live Oak Avenue and Arrow Highway.

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Source: ESRI 2018, MIG 2018

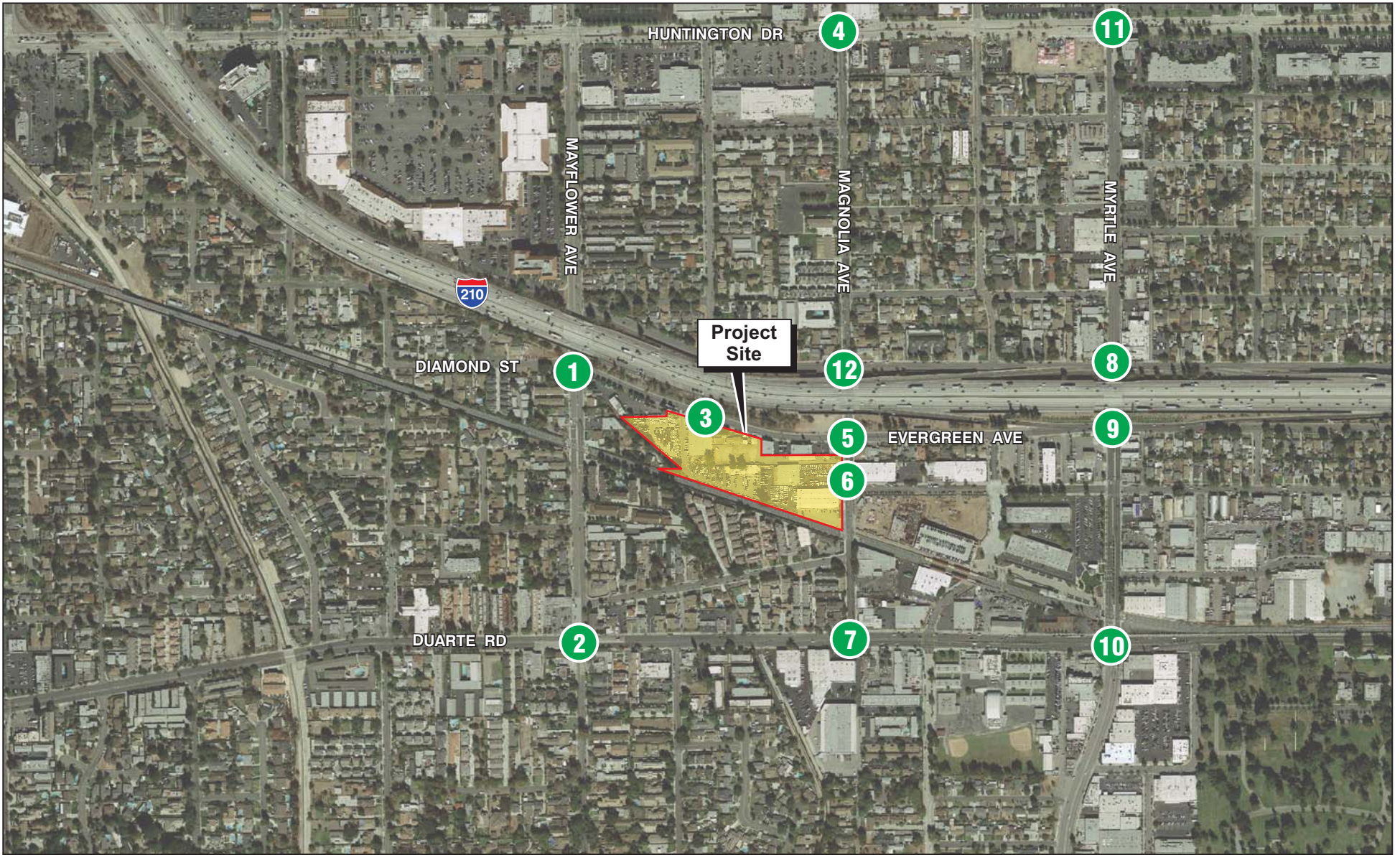
 Project Boundary



**Figure 19-1 Regional Vicinity Map**  
 PD GPA, PD ZCA & Alexan Foothills Specific Plan Project

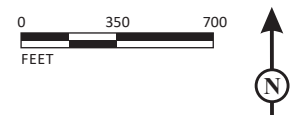
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Source: Google Earth, 2018; LSA, 2018

- Project Site
- Study Area Intersection



**Figure 19-2 Project Locations and Study Intersections**

*PD GPA, PD ZCA & Alexan Foothills Specific Plan Project*

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## Local Transportation

The Project area is bound by Evergreen Avenue to the north, the METRO Gold Line light rail to the south, Mayflower Avenue to the west, and Magnolia Avenue to the east (Figure 19-2).

In the Project area vicinity, Evergreen Avenue is a local street that runs along the south side of I-210 between Mayflower Avenue and Mountain Avenue. Evergreen Avenue provides two-way travel (one lane in each direction) west of Magnolia Avenue and one-way eastbound travel east of Magnolia Avenue. Moving eastward, Evergreen Avenue has two travel lanes from Magnolia Avenue to California Avenue and three lanes of travel from California Avenue to Mountain Avenue. On- and off-ramps of eastbound I-210 intersect with Evergreen Avenue near Myrtle Avenue and Mountain Avenue.

Parking is generally permitted on the south side of Evergreen Avenue west of California Avenue. Parking is prohibited on the north side of Evergreen Avenue and on both sides of the street east of California Avenue. Parking is generally available on both sides of Magnolia Avenue.

Mayflower Avenue is a north-south collector street that runs the length of the City. It has one through lane in each direction from Hillcrest Boulevard to Duarte Road. Left-turn lanes are not provided at most intersections.

## Existing Pedestrian, Bicycle and Transit Facilities

The Project area is currently accessible from nearby public sidewalks, bicycle network, public bus transit and rail transit.

Bicycle access to the Project area is facilitated by the City of Monrovia bicycle roadway network. The existing and proposed facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Route, etc.) in the City's Bicycle Master Plan are located within an approximately one-mile radius of the Project area as illustrated in Figure 19-3.

The Federal and State transportation system recognizes three primary bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Bicycle paths (Class I) are exclusive car free facilities that are typically not located within a roadway area. Bicycle Lanes (Class II) are part of the street design that is dedicated only for bicycles and identified by a striped lane separating vehicle lanes from bicycle lanes. Bicycle Routes (Class III) are preferably located on collector and lower volume arterials streets.

Bicycle facilities in the City's bicycle network located within an approximate one-mile radius from the Project area include:

### East-West Routes

- Evergreen Avenue: Class II Bike Lane
- Pomona Avenue: Class III Bike Route
- Duarte Road: Class III Bike Route

### North-South Routes

- Magnolia Avenue: Class III Bike Route
- California Avenue: Class III Bike Route

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Source: City of Monrovia Bicycle Master Plan 2018

★ Project Site

**Figure 19-3: Existing and Planned Bikeway Network in the City of Monrovia**

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Public bus transit service is currently provided by Foothill Transit and the Metropolitan Transportation Authority (METRO). The METRO Gold Line Monrovia Station is located one block south of the Project area. A summary of existing transit services in the Project area is presented in Table 19-1. As discussed in Chapter 3, the Project area is in a Transit Priority Area defined in CEQA as well as a High Quality Transit Area (HQTA) identified in the Southern California Association of Governments' (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016).

**Table 19-1 Existing Transit Routes Near Project Area**

Route	Destinations	Roadways Near Project
Foothill Transit 187	Azusa to Pasadena via Duarte, Monrovia, Arcadia and Sierra Madre	Myrtle Avenue, Huntington Drive
Foothill Transit 270	El Monte to Monrovia via Irwindale	Myrtle Avenue, Huntington Drive, Duarte Road
METRO 264	Altadena to El Monte via Pasadena, Arcadia and Duarte	Magnolia Avenue, Myrtle Avenue, California Avenue, Duarte Road
METRO Gold Line	East Los Angeles to Azusa via Downtown Los Angeles,	Monrovia Station
	Lincoln Heights, Highland Park, South Pasadena, Pasadena,	
	Arcadia, Monrovia, Duarte and Irwindale	

### **19.1.2 Regulatory Setting**

#### **Regional**

Regional agencies, plans, and programs relevant to transportation and circulation issues in Monrovia include:

- Los Angeles County Metropolitan Transportation Authority (METRO)
- Los Angeles County METRO Active Transportation Strategic Plan (ATSP)
- Los Angeles County METRO Congestion Management Program (CMP)
- Metropolitan Transportation Commission (MTC)
- Southern California Association of Governments (SCAG) – Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS)

#### ***METRO's Long Range Transportation Plan***

The Long Range Transportation Plan (LRTP), prepared by METRO, is the long range plan that responds to emerging environmental challenges through the provision of new initiatives and recommendations that include driving alternatives, mobility improvements, enhanced public transit, expanded rail, and the development of major corridor projects in Los Angeles County.

### ***SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)***

The RTP/SCS has numerous goals to increase mobility for the region's residents and visitors, and an emphasis on sustainability and integrated planning to collectively improve the region's mobility, and economy. Chapter 3 describes the RTP/SCS goals for HQTAs.

### ***Congestion Management Plan (CMP)***

Los Angeles County's Congestion Management Program (CMP) is intended to reduce the impact of local growth on the regional transportation system. Compliance with the CMP includes monitoring LOS on the CMP Highway and Roadway network, measuring public transit operation metrics, implementing the Transportation Demand Management and Land Use Analysis Program Ordinances, and assisting local jurisdictions with meeting CMP requirements. The program recommends allocation of transportation funding based on several measurable goals: traffic congestion relief, local land use actions and their impacts on transportation, and transportation control measures to meet air quality goals.

Even though the City adopted a resolution opting out of the CMP on March 19, 2019, new projects in Los Angeles County must comply with the CMP for Los Angeles County, which was first adopted by METRO in November 1995 pursuant to State law and has been periodically updated since then. The CMP involves (1) monitoring of traffic conditions and performance measures on the designated transportation network, (2) analysis of the impact of land use decisions on the transportation network, and (3) mitigation to reduce impacts on the transportation network.

Appendix D of the CMP includes guidelines for the preparation of TIAs. The TIA guidelines require analysis at monitored street intersections and segments, including freeway on- and off-ramp intersections where a project is expected to add 50 or more peak-hour vehicle trips, and at mainline freeway or ramp monitoring locations where a project is expected to add 150 or more peak-hour trips.

None of the streets in Monrovia are CMP arterial monitoring locations. The nearest CMP monitoring intersections are located outside of Monrovia, including Rosemead Boulevard and Foothill Boulevard in Pasadena, and Azusa Avenue and Foothill Boulevard in Azusa.

There are seven mainline freeway segments within and near Monrovia. These include the following:

- I-210 west of Santa Anita Avenue
- I-210 west of I-605
- I-210 east of I-605
- I-605 south of I-210
- I-605 north of State Route (SR)-60
- I-10 east of Peck Road
- I-10 east of I-605

## Local

### ***Monrovia Circulation Element***

The Circulation Element of the City's General Plan is the City's guide to development of Monrovia's roads and streets as well as a guide to planning pedestrian, bike, and transit routes and facilities in Monrovia. Below are relevant policies of the Circulation Element that are applicable to the Project:

- **Policy 1:1:** Regulate the intensity of land use to keep traffic on any arterial in balance with roadway capacity.
- **Policy 1:2:** Limit direct private property access to arterials, where dual access is possible, to minimize interference with through traffic.
- **Policy 1:5:** Implement traffic signal coordination on City arterial streets to the maximum extent practical and integrate signal coordination efforts with those of adjacent jurisdictions.
- **Policy 1:6:** Develop and implement intersection capacity improvements where feasible and justified by existing or projected traffic demands. Opportunities to improve intersection operations throughout the City are expected to arise as future development occurs, including the area around the planned light rail station.
- **Policy 1:7:** Design and employ traffic control measures, including signalization, limiting access, limiting on-street parking during peak periods, constructing turn lanes, and modifying lane striping and signage to ensure City streets and roads function as needed. One specific location identified for potential re-striping improvements is the eastbound segment of Huntington Drive beneath the I-210 freeway, where the roadway narrows from three through lanes to two.
- **Policy 1:9:** Improve intersection and street sections wherever possible to maintain an acceptable level of service for peak traffic flows. With the recognition that the City is largely built out and that major physical improvements to the circulation system will be limited to certain areas, establish level of service (LOS) D as the minimum standard to be maintained, except at locations where LOS F conditions currently exist. When reviewing impacts at locations where existing development constrains the ability to widen or otherwise improve roadways to achieve the desired LOS, consider improvements to pedestrian and transit facilities as acceptable traffic mitigation measures. The City has determined that a project would have a significant traffic impact under California Environmental Quality Act (CEQA) at an intersection if the conditions in Table II-1 were found<sup>1</sup>. For the purpose of applying these significance criteria, the V/C ratio shall be reported using the Intersection Capacity Utilization (ICU) methodology. LOS at two-way stop-controlled intersections shall be based on the Highway Capacity Manual (HCM)

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<sup>1</sup> Table II-1 comprises the City of Monrovia's significance thresholds for intersections.

methodology and the incremental change in volume-to-capacity (V/C) ratio calculated by analyzing such intersections with the ICU methodology assuming a two-phase signal.

- **Policy 1:10:** For daily traffic, the desired levels of service differ according to the functional classification of the street: LOS D on primary arterials (V/C < 0.90), mid-D on secondary arterials (V/C < 0.85), LOS C on collector streets (V/C < 0.80) and LOS A on local streets (V/C < 0.60). The City has determined that a project would have a significant traffic impact under CEQA on a street if the conditions in Table II-2 are met<sup>2</sup>.
- **Policy 1:12:** Promote ridesharing through publicity and provision of information to the public.
- **Policy 2:2:** All street improvements should be designed with sufficient capacity to accommodate anticipated traffic volumes based on the intensity of existing and planned land use.
- **Policy 2:3:** Design and employ traffic control measures to ensure that City streets and roads function safely and efficiently.
- **Policy 2:6:** Discourage through traffic from using local collector and residential streets.
- **Policy 2:7:** Seek to maintain at least LOS E during peak hours at intersections, except at locations where LOS F currently exists.
- **Policy 2:8:** Regulate the intensity and stages of development so that traffic on any arterial remains in balance with roadway capacity.
- **Policy 2:9:** As new development or redevelopment occurs, limit driveway and alley access onto arterial streets wherever possible to enhance the quality of traffic flow.
- **Policy 2:10:** Consider locating bus turn-outs where appropriate along heavily-traveled arterials or where the lack of a turn-out would be detrimental to traffic flow.
- **Policy 2:13:** Require future dedication for widening of streets and alleys as new development occurs. Prepare and maintain a master map of right-of-way dedications to be pursued as new development proposals are considered. Establish a maintenance program for utilities in alleys (e.g., lighting), access and upgrading of existing alleys.
- **Policy 3:3:** Develop and implement safe and efficient designs to minimize the impact of at-grade arterial railroad crossings. These efforts should be coordinated with the planning for the METRO Gold Line Foothill Extension light rail project, which will affect every grade crossing in the City.

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<sup>2</sup> Table II-2 comprises the City of Monrovia's significance thresholds for road segments.

- **Policy 3:6:** Provide continuity to the sidewalk system, including wheelchair ramps, when new development occurs, to minimize pedestrian/vehicle conflicts.
- **Policy 3:7:** Expand bicycle routes where opportunities arise and demand warrants to minimize conflicts between cyclists and motorists.
- **Policy 3:9:** In response to resident complaints, prepare studies to establish the need for speed bumps and other traffic calming devices in residential areas. Prepare neighborhood traffic protection plans as appropriate.
- **Policy 4:1:** Comply with the requirements of Americans with Disabilities Act (ADA) to ensure accessibility of elderly and disabled persons to public transportation. Continue to support Access Services, which provides ADA-compliant Para transit services (dial-a-ride service) in the City.
- **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 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 6:4:** Continue to improve the accessibility of pedestrian facilities to the elderly and disabled, through such measures as construction of wheelchair ramps.
- **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 6:8:** Require new developments to provide adequate pedestrian paths on adjacent streets, including wheelchair ramps, and through the development projects, where determined to be appropriate.
- **Policy 6:9:** Continue installation of facilities accessible for disabled persons and link public facilities and commercial areas to residential neighborhoods. The use of audible warning devices at intersections along these routes should be considered.

- **Policy 8:2:** Require all new developments to provide off-street parking in compliance with the City's Zoning Code and the requirements of the ADA.

## **19.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts on transportation and circulation that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **19.2.1 Significance Criteria**

Based on current CEQA Guidelines, Appendix G: Items XVII (a) through (d), implementation of the Project would have a significant impact on transportation and circulation if it would:

- (a) Conflict with an applicable program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities;
- (b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3(b);
- (c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- (d) Result in inadequate emergency access.

### **19.2.2 Analysis Methodology**

#### **Study Area Boundary**

As illustrated on Figure 19-2 (Project Location and Study Area Intersections), the traffic study area includes the following intersections:

1. Mayflower Avenue/Diamond Street-Evergreen Avenue (unsignalized)
2. Mayflower Avenue/Duarte Road (signalized)
3. Project Driveway 1/Evergreen Avenue (unsignalized)
4. Magnolia Avenue/Huntington Drive (signalized)
5. Magnolia Avenue/Evergreen Avenue (unsignalized)
6. Magnolia Avenue/Project Driveway 2 (unsignalized)
7. Magnolia Avenue/Duarte Road (signalized)
8. Myrtle Avenue/Central Avenue-Interstate 210 (I-210) Westbound (WB) Ramps (signalized)
9. Myrtle Avenue/Evergreen Avenue-I-210 Eastbound (EB) Ramps (signalized)
10. Myrtle Avenue/Duarte Road (signalized)
11. Myrtle Avenue/Huntington Drive (signalized)
12. Magnolia Avenue/Central Avenue (unsignalized)



Additionally, impacts on the following I-210 ramp intersections under California Department of Transportation's (Caltrans) jurisdiction were analyzed:

- Myrtle Avenue/Central Avenue-I-210 Freeway Westbound Ramps
- Myrtle Avenue/Evergreen Avenue-I-210 Freeway Eastbound Ramps

Finally, impacts on the following City's road segments were also studied:

- Duarte Road
  - West of Mayflower (Segment #1)
  - Mayflower to Magnolia (Segment #2)
  - Magnolia to Myrtle (Segment #3)
  - East of Myrtle (Segment #4)
- Evergreen Avenue
  - Mayflower to Magnolia (Segment #5)
  - Magnolia to Myrtle (Segment #6)
- Huntington Drive
  - Mayflower to Magnolia (Segment #7)
  - Magnolia to Myrtle (Segment #8)
- Mayflower Avenue
  - North of Evergreen (Segment #9)
  - Evergreen to Duarte (Segment #10)
  - South of Duarte (Segment #11)
- Magnolia Avenue
  - Huntington to Evergreen (Segment #12)
  - Evergreen to Duarte (Segment #13)
- Myrtle Avenue
  - Huntington to Central (Segment #14)
  - Central to Duarte (Segment #15)
  - South of Duarte (Segment #16)

## **Performance Criteria**

### ***Intersection Criteria***

The intersection capacity utilization (ICU) methodology was used to determine the peak-hour operations at signalized intersections in the study area. The ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. The resulting ICU is expressed in terms of level of service (LOS), where LOS A represents free-flow activity and LOS F represents overcapacity operation. Parameters set by the City for ICU calculations - including lane capacity, right-turn treatment, and clearance interval - are incorporated into the analysis.

According to the Monrovia General Plan Circulation Element, LOS at an intersection is considered to be unsatisfactory when the ICU exceeds 0.90 (LOS D) within the City, except at locations where LOS F conditions currently exist. The relationship of ICU to LOS is demonstrated in the Table 19-2.

**Table 19-2 Comparison of Level of Service (LOS) and Intersection Capacity Utilization (ICU)**

LOS	ICU
A	0.00–0.60
B	0.61–0.70
C	0.71–0.80
D	0.81–0.90
E	0.91–1.00
F	> 1.00

Source: Highway Capacity Manual (Transportation Research Board 2016).

Based on discussion with the City of Monrovia Traffic Engineer, a project impact occurs when the intersection in question exceeds the acceptable LOS of E or F, or the impact of a proposed development results in an increase of ICU of 0.04 or greater for LOS C, 0.03 or greater for LOS D, 0.02 or greater for LOS E, or 0.01 or greater for LOS F. Project mitigation will be required to achieve acceptable levels, or to achieve the baseline condition if the baseline ICU is already greater than 0.90.

In addition to the ICU methodology of calculating signalized intersection LOS, the Highway Capacity Manual (HCM 6th Edition, Transportation Resources Board 2016) methodology was used to determine the LOS at unsignalized study area intersections and signalized intersections at freeway interchanges. The HCM unsignalized and signalized intersection methodology looks at delay (in seconds per vehicle), as opposed to capacity, as the measure of effectiveness. The resulting delay is expressed in terms of LOS, much like the ICU methodology. The relationship of delay to LOS is illustrated in Table 19-3.

**Table 19-3 Comparison of Level of Service (LOS) and Intersection Delay**

LOS	Signalized Intersection Delay (seconds)	Unsignalized Intersection Delay (seconds)
A	≤10.0	≤10.0
B	>10.0 and ≤20.0	>10.0 and ≤15.0
C	>20.0 and ≤35.0	>15.0 and ≤25.0
D	>35.0 and ≤55.0	>25.0 and ≤35.0
E	>55.0 and ≤80.0	>35.0 and ≤50.0
F	>80.0	>50.0

Source: Highway Capacity Manual (Transportation Research Board 2016).

The TIA, consistent with City guidelines, evaluates traffic impacts based on the ICU methodology. The HCM methodology is another method to evaluate operational conditions at signalized intersections, takes into consideration signal timing, and can calculate queue lengths at turn lanes. The HCM methodology is required by Caltrans to analyze impacts on Caltrans' ramp intersections. Acceptable LOS for Caltrans intersections is LOS D or better. Further details of the HCM methodology are contained in the TIA in Appendix J of this EIR.

### Roadway Segment Criteria

Facility types for studied roadways were taken from the City’s General Plan Circulation Element. The roadway segments of Huntington Drive and Myrtle Avenue are classified as primary arterials, Duarte Road is classified as a secondary arterial, and the segments of Mayflower Avenue, Magnolia Avenue, and Evergreen Avenue are classified as collector streets.

The City has established the maximum desirable daily LOS and v/c for specific facility types, as shown in Table 19-4.

**Table 19-4 Monrovia Maximum Desirable Daily LOS and V/C**

Type of Street	Maximum Desirable Daily LOS and V/C
Primary Arterial	LOS D (v/c ≤0.90)
Secondary Arterial	LOS Mid-D (v/c ≤0.85)
Collector Street	LOS C (v/c ≤0.80)
Local Street	LOS A (v/c ≤0.60)
Source: City of Monrovia General Plan Circulation Element (2012). Notes: LOS level of service v/c volume-to-capacity ratio	

A project impact occurs when the roadway segment in question exceeds the acceptable LOS and the project-related traffic increases the daily traffic by 2.5 percent or more.

For the Project (“future year 2035 conditions – program scenario”), v/c ratios were determined using the City’s theoretical daily capacity of 9,000 vehicles per lane for primary arterials, secondary arterials, and collector streets as assumed in the Traffic Study prepared for the proposed amendments to the Monrovia General Plan’s Land Use and Circulation Elements (City of Monrovia 2007).

### Traffic Scenarios

The following traffic scenarios were analyzed for the proposed Alexan Foothills Specific Plan and ZCA Areas A and C (collectively referred to as the “Project” in this Chapter):

- Existing (2018) Conditions;
- Existing Plus Specific Plan Conditions;
- Cumulative Year (2022) Conditions;
- Cumulative Year (2022) Plus Specific Plan Conditions;
- Future Year (2035) Conditions;
- Future Year (2035) Plus Specific Plan Conditions; and
- Future Year (2035) Plus Program Conditions.

Each of these scenarios is explained in more detail below.

**Existing (2018) Conditions.** This scenario identifies current traffic conditions in the study area. In order to take the existing onsite traffic into account, 24-hour counts were taken at the shared driveways of the existing facilities in the Alexan Foothills Specific Plan area. Peak-hour

intersection turn volumes and roadway segment average daily traffic (ADT) volumes for the study area were obtained from the City. All counts used in the traffic study were conducted on a Tuesday, Wednesday, or Thursday. Counts were collected at the time the initial TIA was prepared, between 2016 and 2017.

Time passed between the completion of the TIA and the processing of the Project application. The original traffic counts were factored up to account for any potential changes that occurred between the time the counts were taken and the beginning of 2018. A regional ambient traffic growth rate of 0.82 percent per year was added to the existing traffic volumes to escalate the counts to the year 2018. This growth rate was obtained from the Los Angeles County Congestion Management Program.

**Existing Plus Specific Plan Conditions.** This scenario is used to evaluate impacts associated with the Alexan Foothills Specific Plan. The analysis assumes that the existing Specific Plan area land uses would be removed and replaced by the proposed Alexan Foothills Specific Plan where 432 apartments and 4 live/work units are proposed. Based on discussions with the City Traffic Engineer, vehicle trip generation has been reduced by 20 percent for trip credits based on transit use. Trip distribution for the Specific Plan was based on its location in relation to local and regional transportation facilities and origins/destinations, along with input and concurrence from the City Traffic Engineer.

**Cumulative Year (2022) Conditions.** To forecast cumulative traffic conditions, a regional ambient traffic growth rate was determined plus traffic volumes for near-future developments in the Project vicinity were developed, which were then added to the existing traffic counts.

To reflect regional growth in the study area, an ambient traffic growth rate of 0.82 percent per year was calculated from year 2018 to year 2022 and added to the existing traffic volumes. This growth rate was obtained from the Los Angeles County Congestion Management Program. The list of cumulative projects was provided by the City of Monrovia Planning Division (see the TIA in Appendix J of this EIR).

**Cumulative Year (2022) Plus Specific Plan Conditions.** This scenario is used to evaluate cumulative impacts associated with only implementation of the Alexan Foothills Specific Plan (ZCA Areas A and C are excluded from this scenario). Cumulative plus Specific Plan conditions were developed by adding Alexan Foothills Specific Plan traffic to the cumulative conditions. This scenario assumes no change in existing intersection designs (i.e., geometrics). Construction of the Alexan Foothills Specific Plan is anticipated to start in 2020 and is expected to take 30 months to complete, with an anticipated operation date of 2022. Buildout of the ZCA Areas A and C is still anticipated to start in 2021 and take 12 months to complete, with full buildout assumed to be completed in 2022.

**Future Year (2035) Conditions.** A future year 2035 roadway link analysis was performed consistent with the General Plan Traffic Study (2007). A regional ambient growth rate (7.65 percent, 0.45 percent per year for 17 years) and the traffic volumes from the cumulative projects were applied to the existing roadway segment average daily traffic volumes (ADT) to forecast 2035 conditions. The growth rate was obtained from the Los Angeles County Congestion Management Program.

**Future Year (2035) Plus Specific Plan Conditions.** This scenario is used to evaluate year 2035 cumulative impacts of the Alexan Foothills Specific Plan only (ZCA Areas A and C are excluded).

Future plus Specific Plan conditions were developed by adding Alexan Foothills Specific Plan traffic to the future conditions. This scenario assumes no change in existing intersection designs (i.e., geometrics).

**Future Year (2035) Plus Program Conditions.** This scenario is used to evaluate the Alexan Foothills Specific Plan and ZCA Areas A and C. This consolidated project- and program-level analysis evaluates impacts associated with the Alexan Foothills Specific Plan development (a total of 436 residential units) plus an additional 82 dwelling units in ZCA Areas A and C, for a total of up to 518 residential units. Traffic associated with ZCA Areas A and C (i.e., 82 more units) was added to the year 2035 roadway link analysis using the same trip generation and trip distribution as the existing and cumulative conditions scenarios, based on the daily and peak-hour trip rates taken from the Trip Generation Manual, 9th Edition<sup>3</sup> (ITE 2012), with a 20 percent trip credit based on transit use. This scenario assumes no change in existing intersection designs (i.e., geometrics). The purpose of this scenario is to evaluate the potential transportation and circulation impacts of maximum development potential over the entire 9.63-acre Project area.

### **19.2.3 Environmental Impacts**

## **IMPACT T-1 ALEXAN FOOTHILLS SPECIFIC PLAN INTERSECTION ANALYSIS**

### **Existing (2018) Conditions**

Table 19-5 summarizes the results of the existing AM and PM peak-hour LOS analysis. All ten study area intersections currently operate at satisfactory LOS.

### **Alexan Foothills Specific Plan Trip Generation**

Trip generation calculations for the Alexan Foothills Specific Plan were based on the daily and peak-hour trip rates taken from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9<sup>th</sup> Edition (2012) (see TIA in Appendix J of this EIR). It is noted that the ITE recently published a 10<sup>th</sup> edition of this Trip Generation Manual. The trip rates for apartment use are greater in the 9<sup>th</sup> edition than the 10<sup>th</sup> edition. At the direction of City staff during the time of preparation of the TIA, the 9<sup>th</sup> edition rates were used for a more conservative assessment. Based on discussions with the City Traffic Engineer, vehicle trip generation has been reduced by 20 percent for trip credits based on transit use. The trip credits based on transit use account for the Project area's proximity to the METRO Gold Line station, as well as to four bus stations, at Mayflower Avenue/Duarte Road and Magnolia Avenue/Duarte Road.

Existing land uses within the Alexan Foothills Specific Plan area generate 393 trips per day, including 36 trips during the AM peak hour (25 inbound and 11 outbound) and 25 trips in the PM peak hour (8 inbound and 17 outbound). With transit use, projected trips generated under the Alexan Foothills Specific Plan would result in a trip generation of 2,331 trips per day, including 179 trips in the A.M. peak hour (37 inbound and 142 outbound) and 219 trips in the PM peak hour (140 inbound and 79 outbound). The total net trip generation (i.e., future Alexan Foothills Specific Plan trips minus existing trips) would add 1,938 trips per day to study area intersections, including

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<sup>3</sup> At the time the TIA was prepared, the 10<sup>th</sup> Edition of Trip Generation Manual had not been released. However, trip generation rates from the 9<sup>th</sup> Edition are more conservative. Therefore, the analysis was not revised using the 10<sup>th</sup> Edition.

143 trips in the AM peak hour (12 inbound and 131 outbound) and 194 trips in the PM peak hour (132 inbound and 62 outbound).

### **Trip Distribution and Assignment**

Trip distribution for the Specific Plan was based on its location in relation to local and regional transportation facilities and origins/destinations, along with input and concurrence from the City Traffic Engineer.

### **Existing Plus Specific Plan Conditions**

Table 19-5 summarizes the results of the existing plus Alexan Foothills Specific Plan AM and PM peak-hour LOS analysis, and compares those results with existing LOS conditions. All study area intersections would continue to operate at a satisfactory LOS according to the City's thresholds of significance with the addition of traffic associated with the proposed Alexan Foothills Specific Plan. Therefore, the impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### **Cumulative Year (2022) Without Specific Plan Conditions**

Table 19-6 summarizes the results of the AM and PM peak-hour LOS analysis under cumulative conditions without the proposed Alexan Foothills Specific Plan. All study area intersections are anticipated to operate at satisfactory LOS, with the exception of:

- #8. Myrtle Avenue/Central Avenue and I-210 Westbound Ramps during the PM peak hour
- #9. Myrtle Avenue/Evergreen Avenue and I-210 Eastbound Ramps during the PM peak hour
- #10. Myrtle Avenue/Duarte Road during the PM peak hour

### **Cumulative Year (2022) Plus Specific Plan Conditions**

Table 19-6 summarizes the results of the cumulative plus Alexan Foothills Specific Plan AM and PM peak-hour LOS analysis, and compares those results with cumulative LOS conditions without the Specific Plan. With the addition of the proposed Alexan Foothills Specific Plan, all study area intersections would continue to operate at satisfactory LOS, with the exception of the three previously identified deficient intersections above (#8, #9, and #10) plus:

- #5. Magnolia Avenue/Evergreen Avenue during the PM peak hour
- #8. Myrtle Avenue/Central Avenue and I-210 Westbound Ramps during the AM peak hour

The addition of Alexan Foothills Specific Plan trips would exceed City thresholds of significance at the intersections of Magnolia Avenue/Evergreen Avenue in the PM peak hour (i.e., would result in an increase of the ICU by 0.04 or greater) and at the Myrtle Avenue/Central Avenue–I-210 westbound ramps in the PM peak hours (i.e., would result in an increase of the ICU by 0.02 or greater). Therefore, impacts on these two intersections by the Alexan Foothills Specific Plan are considered potentially significant.

The TIA for the Alexan Foothills Specific Plan recommends the following improvements to the intersection of Magnolia Avenue/Evergreen Avenue (Intersection #5):

- Restripe and move the centerline for the northern and southern legs of the intersection two feet to the west to allow for de facto northbound right-turns.

The TIA for the Alexan Foothills Specific Plan recommends the following improvements to the intersection of Myrtle Avenue/Central Avenue and I-210 Westbound Ramps (Intersection #8):

- Restripe the southbound travel lanes from a shared southbound through-right lane and a southbound through lane to an exclusive southbound right-turn lane and two southbound through lanes. This solution appears to be feasible within the existing right-of-way without modifying the existing curb or centerline; the center median on the southern leg of Myrtle Avenue at the intersection may require minor modifications.

Mitigation measure MM T-1 is proposed to ensure that the applicant pays their fair share of improvements to area roadways to reduce cumulative impacts associated with the Alexan Foothills Specific Plan to less than significant levels. With implementation of mitigation, impacts would be less than significant.

### **Mitigation Measures**

Mitigation measure MM T-1 is applicable to the Alexan Foothills Specific Plan.

**MM T-1:** The City of Monrovia has conducted an Area Traffic Study and is devising a Development Impact Fee (DIF) program to address the cumulative effects of major development projects on the transportation system in the vicinity of the Monrovia Gold Line Station. The DIF will include each project's fair share cost of the traffic study and the recommended mitigation measure(s) identified for that project's specific impact(s). If the City Council adopts the DIF, it shall be paid prior to recording the Final Map or the amount of the DIF included in the bonds. Payment or bonding of the DIF shall fully satisfy the project's mitigation obligation for those improvements covered by the DIF. If the City Council does not adopt a DIF but does approve an Area Traffic Study that commits future applicants to pay fair share fees and obligates the City to spend those fees on specified improvements, the project will not pay a DIF, but will be responsible for their fair share as a fee in-lieu of improvements for mitigating the specific impacts identified in the project's Traffic Study. **Requirements and Timing:** The costs of those improvements or fee-in-lieu-of mitigation shall be paid prior to the Final Map recording, or a bond equal to the determined amount shall be posted prior to the Final Map recording. **Monitoring:** City staff shall confirm payment of either the costs of those improvements or fee-in-lieu of mitigation prior to recordation of the Final Map.

### **IMPACT T-2 ALEXAN FOOTHILLS SPECIFIC PLAN RAMP INTERSECTION ANALYSIS**

#### **Existing and Existing Plus Specific Plan Ramp Intersection Analysis (Caltrans Criteria)**

To demonstrate the effect that the Alexan Foothills Specific Plan would have on the ramp intersections under Caltrans' jurisdiction, an Existing (2018) Conditions and an Existing Plus Specific Plan (Alexan Foothills Specific Plan only) HCM analysis was prepared, as required by Caltrans (see Section 19.2.2, Analysis Methodology/Performance Criteria, of this Chapter). Table 19-7 presents a summary of Existing and Existing Plus Specific Plan ramp intersection operations.

All study area ramp intersections currently operate at satisfactory LOS during the AM and PM peak hours. With the addition of the Alexan Foothills Specific Plan, all study area freeway ramp intersections would continue to operate at satisfactory LOS. Therefore, under Existing Plus Specific Plan Conditions, the impact of the Alexan Foothills Specific Plan on peak-hour ramp intersection operations under Caltrans significance thresholds would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### **Cumulative and Cumulative Plus Specific Plan Ramp Intersection Analysis (Caltrans Criteria)**

To demonstrate the effect that the Alexan Foothills Specific Plan would have on the ramp intersections under Caltrans' jurisdiction, a Cumulative Year (2022) Conditions, a Cumulative Plus Specific Plan (Alexan Foothills Specific Plan only) HCM analysis was prepared, as required by Caltrans (see Section 19.2.2, Analysis Methodology/Performance Criteria, of this Chapter). Table 19-8 presents a summary of Cumulative and Cumulative Plus Specific Plan ramp intersection operations.

The Cumulative Plus Specific Plan scenario would exceed Caltrans' thresholds of significance at the ramp intersection of Myrtle Avenue/Central Avenue–I-210 eastbound ramp in the PM peak hours. Therefore, impacts on this ramp intersection by the Alexan Foothills Specific Plan are considered potentially significant.

The TIA for the Alexan Foothills Specific Plan recommends the following improvements to the intersection of Myrtle Avenue/Central Avenue and I-210 Eastbound Ramps (Intersection #9):

- Reassigning the eastbound through movement to an eastbound through-left movement.

Implementation of mitigation measure MM T-1 would ensure that the applicant pays their fair share of improvements to area roadways to reduce cumulative impacts associated with the Alexan Foothills Specific Plan to less than significant levels. With implementation of mitigation, impacts would be less than significant.

### **Mitigation Measures**

Refer to mitigation measure MM T-1 above.



**Table 19-5 Existing Baseline and Existing Plus Specific Plan LOS Summary**

Intersection		Existing				Plus Specific Plan				Peak-Hour Δ ICU/HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	
		ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS			
1	Mayflower Avenue/Diamond Street-Evergreen Avenue	22.6	C	19.7	C	23.8	C	22.1	C	1.2	2.4	No
2	Mayflower Avenue/Duarte Road	0.695	B	0.654	B	0.696	B	0.659	B	0.001	0.005	No
3	Project Driveway 1/Evergreen Avenue	N/A	-	N/A	-	10.3	B	10.3	B	-	-	No
4	Magnolia Avenue/Huntington Drive	0.709	C	0.742	C	0.722	C	0.754	C	0.013	0.012	No
5	Magnolia Avenue/Evergreen Avenue	15.5	C	18.2	C	19.2	C	25.8	D	3.7	7.6	No
6	Magnolia Avenue/Project Driveway 2	N/A	-	N/A	-	14.8	B	17.1	C	-	-	No
7	Magnolia Avenue/Duarte Road	0.628	B	0.591	A	0.636	B	0.598	A	0.008	0.007	No
8	Myrtle Avenue/Central Avenue-I-210 WB	0.774	C	0.877	D	0.788	C	0.898	D	0.014	0.021	No
9	Myrtle Avenue/Evergreen Avenue-I-210 EB	0.671	B	0.835	D	0.680	B	0.849	D	0.009	0.014	No
10	Myrtle Avenue/Duarte Road	0.776	C	0.875	D	0.777	C	0.881	D	0.001	0.006	No

Source: LSA (May 2018). See Appendix J of this EIR.  
 Notes:  
 Δ change  
 EB eastbound  
 I-210 Interstate 210  
 ICU intersection capacity utilization ratio  
 HCM Highway Capacity Manual delay (seconds per vehicle)  
 LOS = level of service  
 N/A = not applicable; driveway does not currently exist  
 WB = westbound

**Table 19-6 Cumulative Baseline (2022) and Cumulative Plus Specific Plan LOS Summary**

Intersection		Cumulative				Cumulative Plus Specific Plan				Peak-Hour $\Delta$		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		ICU/HCM		
		ICU/HC	LOS	ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	AM	PM	
1	Mayflower Avenue/Diamond Street- Evergreen Avenue (unsignalized)	25.1	D	21.5	C	26.4	D	24.5	C	1.3	3.0	No
2	Mayflower Avenue/Duarte	0.723	C	0.676	B	0.724	C	0.681	B	0.001	0.005	No
3	Project Driveway 1/Evergreen Avenue	N/A	-	N/A	-	10.4	B	10.3	B	-	-	No
4	Magnolia Avenue/Huntington	0.752	C	0.785	C	0.764	C	0.797	C	0.012	0.012	No
5	Magnolia Avenue/Evergreen Avenue (unsignalized)	20.4	C	23.8	C	28.7	C	40.8	E	8.3	17.0	Yes
6	Magnolia Avenue/Project Driveway 2 (unsignalized)	N/A	-	N/A	-	16.8	C	19.0	C	-	-	No
7	Magnolia Avenue/Duarte	0.672	B	0.631	B	0.680	B	0.636	B	0.008	0.005	No
8	Myrtle Avenue/Central Avenue-I-210 WB Ramps	0.894	D	0.958	E	0.908	E	0.980	E	0.014	0.022	Yes
9	Myrtle Avenue/Evergreen Avenue-I-210 EB Ramps	0.775	C	0.936	E	0.784	C	0.950	E	0.009	0.014	No
10	Myrtle Avenue/Duarte Road	0.818	D	0.919	E	0.819	D	0.925	E	0.001	0.006	No

Source: LSA (2018, 2019). See Appendix J of this EIR.

Notes:

Gray shading indicates that values exceed City of Monrovia's level of service criteria.

$\Delta$  = change

I-210 = Interstate 210

EB = eastbound

HCM = Highway Capacity Manual delay (seconds per vehicle)

ICU = intersection capacity utilization ratio

LOS = level of service

N/A = not applicable; driveway does not currently exist

WB = westbound

**Table 19-7 Existing and Existing Plus Specific Plan Ramp Intersection Summary (Caltrans Criteria)**

Intersection		Existing				Existing Plus Specific Plan				Peak-Hour $\Delta$ HCM		Significant Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	
		HCM	LOS	HCM	LO	HCM	LO	HCM	LO			
8	Myrtle Avenue/ Central Avenue-I-210 WB Ramps	21.4	C	33.6	C	22.2	C	36.6	D	0.8	3.0	No
9	Myrtle Avenue/ Evergreen Avenue-I-210 EB Ramps	21.9	C	30.2	C	22.1	C	32.5	C	0.2	2.3	No

Source: LSA (May 2018). See Appendix J of this EIR.  
 Notes:  
 $\Delta$  = change  
 EB = eastbound  
 HCM = Highway Capacity Manual delay (seconds per vehicle)

**Table 19-8 Cumulative and Cumulative Plus Alexan Foothills Specific Plan Ramp Intersection Summary (Caltrans Criteria)**

Intersection		Cumulative				Cumulative Plus Specific Plan				Peak-Hour $\Delta$ HCM		Significant Impact?
		AM Peak		PM Peak		AM Peak		PM Peak		AM	PM	
		HCM	LO	HCM	LO	HCM	LO	HCM	LO			
8	Myrtle Avenue/ Central Avenue-I-210 WB Ramps	39.8	D	47.7	D	42.3	D	51.6	D	2.5	3.9	No
9	Myrtle Avenue/ Evergreen Avenue-I-210 EB Ramps	28.7	C	50.2	D	30.0	C	55.5	E	1.3	5.3	No

Source: LSA (2018, 2019). See Appendix J of this EIR.  
 Notes:  
 Gray shading indicates that values exceed City of Monrovia's LOS criteria  
 $\Delta$  = change  
 EB = eastbound  
 HCM = Highway Capacity Manual delay (seconds per vehicle)  
 I-210 = Interstate 210  
 LOS = level of Service  
 WB = westbound

## **IMPACT T-3 FULL PROJECT ROAD SEGMENT ANALYSIS**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

#### ***Future Year (2035) Conditions***

A future year 2035 roadway link analysis was performed consistent with the City's General Plan Traffic Study (City of Monrovia 2007). The regional ambient growth rate (7.65 percent, 0.45 percent per year for 17 years) and the traffic volumes from the cumulative projects were applied to the existing roadway segment ADT to forecast 2035 conditions. The growth rate was obtained from the Los Angeles County Congestion Management Program. An impact analysis on study area intersections could not be performed on the programmatic level as the City does not have a traffic demand model where hourly traffic volumes through study area intersections could be projected.

Table 19-9 summarizes the results of the roadway segment LOS analyses under future conditions without the Project. All study area roadway segments are anticipated to operate at satisfactory LOS.

#### ***Future Year (2035) Plus Specific Plan Conditions***

Table 19-9 summarizes the results of the Future Year (2035) Plus the Alexan Foothills Specific Plan roadway segment LOS analysis and compares those results with future 2035 conditions without the Alexan Foothills Specific Plan. All study area roadway segments would continue to operate at satisfactory LOS pursuant to City thresholds of significance with the addition of the proposed Alexan Foothills Specific Plan traffic. The impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

#### ***Future Year (2035) Program Conditions***

The Year 2035 Plus Program scenario is used to evaluate overall impacts on road segments from the Alexan Foothills Specific Plan plus ZCA Areas A and C. This consolidated project- and program-level analysis evaluates overall impacts associated with the Alexan Foothills Specific Plan development (a total of 436 residential units) plus an additional 82 potential units in ZCA Areas A and C, for a total of up to 518 residential units, minus the existing land uses onsite. Traffic associated with ZCA Areas A and C was added to the Year 2035 roadway link analysis using the same trip generation and trip distribution as the Existing and Cumulative Conditions scenarios, based on the daily and peak-hour trip rates taken from the Trip Generation Manual, 9th Edition (ITE 2012), with a 20 percent trip credit based on transit use. This scenario assumes no change in existing intersection designs (i.e., geometrics). The purpose of this scenario is to evaluate the potential transportation and circulation impacts of maximum development potential over the entire 9.63-acre Project area.

Table 19-10 summarizes the results of the Year 2035 roadway segment analysis without and with the full Project (Alexan Foothills Specific Plan and ZCA Areas A and C). The net trip generation with the Alexan Foothills Specific Plan and ZCA Areas A and C would be 2,363 ADT. All study

area roadway segments would operate at satisfactory LOS pursuant to City thresholds of significance both without and with the full Project. The impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT T-4 OFF-RAMP QUEUING ANALYSIS**

### **Alexan Foothills Specific Plan**

A queuing analysis was conducted for the Alexan Foothills Specific Plan at the I-210 eastbound and westbound off-ramps intersecting Myrtle Avenue, for the AM and PM peak hours, in order to anticipate any spill-back of vehicles from the off-ramps onto the I-210 freeway. The queuing analysis was calculated using the *Synchro 10* software package which includes a microsimulation module (SimTraffic). In forecasting vehicle queuing, the *Synchro* software considers traffic volume data, lane configurations, and available vehicle storage lengths for the respective traffic movements.

The I-210 eastbound off-ramp is a dual-lane ramp approximately 815 feet long, for a total of 1,630 feet of queue storage. The off-ramp queuing analysis utilized the traffic volumes available at the intersection of Myrtle Avenue/Evergreen Avenue and I-210 eastbound off-ramp. The I-210 westbound off-ramp is a single-lane ramp with approximately 990 feet of queue storage. The off-ramp queuing analysis utilized the traffic volumes available at the intersection of Myrtle Avenue/Central Avenue-I-210 westbound off-ramp. Complete details of the analysis are included in the TIA (Appendix J of this EIR). Based on this analysis, all off-ramp queues are forecast to operate within the provided capacity along the I-210 eastbound and westbound off-ramps. This impact would be less than significant.

### **ZCA Areas A and C**

A queuing analysis was not performed for the ZCA Areas A and C because project-specific development has not been identified at this time. Future development projects within ZCA Areas A and C would undergo analysis to determine impacts and whether site improvements or mitigation measures are needed.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT T-5 ALTERNATIVE MOBILITY MODES**

### **ZCA Areas A and C**

It is too speculative at this time to review access to and use alternative mobility modes for ZCA Areas A and C, as no development projects have been proposed. These topics would be reviewed as future projects are proposed within Areas A and C.

## **Alexan Foothills Specific Plan**

The Alexan Foothills Specific Plan incorporates design features to accommodate pedestrian circulation onsite. For example, bike parking is provided and pedestrian traffic would be afforded safe travel via plazas and sidewalks throughout the site that connect to the public right-of-way (see Figures 3-4 and 3-12).

Transit facilities are accessible to and from the Specific Plan area within a 0.25-mile radius. METRO bus stops are provided at the northeast and southwest corners of Mayflower Avenue/Duarte Road (Routes 264 and 267), and at the northwest and southeast corners of Magnolia Avenue/Duarte Road (Routes 264 and 267). These METRO bus routes travel to the cities of Altadena, Pasadena, Arcadia, El Monte, and Duarte.

The METRO Gold Line station is southeast of the Specific Plan area, within a 0.2-mile walk. The METRO Gold Line provides transportation from Azusa to East Los Angeles via downtown Los Angeles. The applicant for the Alexan Foothills Specific Plan and the City conducted consultation with METRO as well as the California Public Utilities Commission (CPUC) in accordance with METRO's *Adjacent Development Handbook* (METRO 2018).

METRO and CPUC expressed safety concerns with pedestrians attempting to access the METRO Gold Line station from the Alexan Foothills Specific Plan area across the street at Magnolia Avenue without a cross walk, immediately north of the railroad tracks. Therefore, the applicant for the Alexan Foothills Specific Plan and the City propose an alternate route from the Specific Plan area to the METRO Gold Line via a pathway internal to the new apartment complex leading from the parking structure to a new striped crosswalk at the intersection of Magnolia Avenue and Evergreen Avenue, further north of the railroad tracks. The applicant also proposes to remove a formerly proposed pedestrian walkway on the southeast end of the property and to now gate pedestrian access to Magnolia Avenue at the southeast corner of the property to discourage pedestrians from attempting to cross Magnolia Avenue close to the railroad tracks.

In the Project vicinity, on-street (Class III) bicycle routes are indicated along Magnolia Avenue in the Monrovia General Plan. As indicated in Figures 3-4 and 3-12, the Project provides bicycle parking affords access to this bicycle route.

The Alexan Foothills Specific Plan would provide enhanced access for pedestrians, bicyclists, and transit users in the area. Therefore, the impact on alternative mobility modes, including walking, bicycling, and transit, would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

## **IMPACT T-6 CONSISTENCY WITH CEQA GUIDELINES SECTION 15064.3(B)**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Changes to CEQA and the CEQA Guidelines recently went into effect on December 28, 2018, whereby Section 15064.3 of the CEQA Guidelines titled "Determining the Significance of Traffic Impacts" was added and states:

“(a) Purpose.

This section describes specific considerations for evaluating a project’s transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project’s effect on automobile delay shall not constitute a significant environmental impact.

(b) Criteria for Analyzing Transportation Impacts.

Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project’s vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project’s vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

(c) Applicability. The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.”

As described in Chapter 3, the Project qualifies as a project within one-half mile of an existing major transit stop and therefore, is a mixed-use project in a TPA and in a HQT. According to the new CEQA Guidelines, the proposed Project “should be presumed to cause a less than significant transportation impact.” However, this statement is based upon an analysis of vehicle miles

traveled from developments of this type. Vehicle Miles Traveled (VMT) is a measure of the number of miles traveled by vehicles within a specified region for a specific time period. VMT enables evaluation of a project's impacts on accessibility of a region rather than intersection delay measured by LOS. Evidence must be provided to substantiate a statement that impacts "should be presumed to cause a less than significant transportation impact." In the TIA for the Alexan Foothills Specific Plan, VMT for the Specific Plan were calculated using the California Emissions Estimator Model (CalEEMod); based on the CalEEMod run in the TIA, the proposed Alexan Foothills Specific Plan would result in a net increase of 19,837 VMT, with a 20 percent transit credit incorporated into the trip generation (see Appendix J, TIA). VMT were not reported in the TIA for ZCA Areas A and C, as specific land uses are currently unknown for these areas.

The Project is located proximate to a METRO Gold Line transit station and other TOD development designed to encourage walking and use of public transit. The Alexan Foothills Specific Plan promotes City-wide TOD goals by building on the synergy of the adjacent Station Square Planning Area. The Alexan Foothills Specific Plan would activate the area surrounding the transit station and other adjacent TOD development by enhancing the attractiveness and walkability of the area with landscaping, public art, and pedestrian pathways. While VMT may increase at the site due to the increase in residential units, locating development within close proximity to transit and other TOD development is precisely the land use strategy promoted by the state and the City to reduce VMT on a regional and state-wide basis.

However, the City of Monrovia, has not yet developed thresholds of significance based upon VMT and therefore, has elected to wait to adopt the provisions of Section 15064.3(b) of the CEQA Guidelines until the required date of July 1, 2020. In addition, the TIA was prepared using LOS as the threshold of significance. Therefore, use of LOS as the threshold of significance for transportation impacts was used for the Alexan Foothills Specific Plan.

## **Mitigation Measures**

No mitigation measures are required.

## **IMPACT T-7 HAZARDS AND EMERGENCY ACCESS**

### **ZCA Areas A and C**

It is too speculative at this time to review hazards, emergency access, driveway access, or site distance for ZCA Areas A and C, as no development projects have been proposed. These topics would be reviewed as future projects are proposed within Areas A and C.

### **Alexan Foothills Specific Plan**

Hazards and emergency access to and from the Alexan Foothills Specific Plan area were evaluated in a driveway access analysis and a sight distance analysis as discussed below.

#### ***Driveway Access Analysis***

Access to the Alexan Foothills Specific Plan area would be provided by two full-access driveways, one each along Evergreen Avenue and Magnolia Avenue. Each driveway would have one lane for inbound travel and another lane for outbound travel. An HCM-based intersection analysis was utilized to evaluate the adequacy and performance of the two proposed unsignalized driveways.



As presented previously in Tables 19-5 and 19-6, the intersections of Project Driveway 1/Evergreen Avenue and Magnolia Avenue/Project Driveway 2 are anticipated to operate at satisfactory LOS during the AM and PM peak hours in both the Existing Plus Specific Plan and Cumulative Plus Specific Plan Scenarios. Consistent with HCM unsignalized intersection analysis methodology, the LOS results shown in Tables 19-5 and 19-6 represent the delay in seconds for the worst affected movement, in this case the outbound left-turn movements.

To assess the performance of inbound vehicles coming off Evergreen Avenue and Magnolia Avenue, the calculated delay values of the inbound left-turn movements are presented in Table 19-11. All inbound left-turn movements are anticipated to operate at LOS A. Right-turning vehicles entering either driveway from the uncontrolled (i.e., no stop sign or traffic signal) adjacent roadway should not experience any control delay and, therefore, are not represented in the table. The Alexan Foothills Specific Plan would not result in inadequate emergency access and the impact on driveway access would be less than significant.

### ***Sight Distance Analysis***

Sight distance has been reviewed for both proposed Specific Plan driveways. Evergreen Avenue and Magnolia Avenue have a speed limit of 35 miles per hour (mph). The Caltrans Highway Design Manual (2017) recommends a corner sight distance of 385 feet for a design speed of 35 mph. More than 385 feet of sight distance is available for the driveway along Evergreen Avenue in both directions. Also, more than 385 feet of sight distance is available for the driveway along Magnolia Avenue in both directions. Based on existing roadway design and the proposed site layout, no obstructions are anticipated for outbound Project vehicles onto the immediately adjacent streets from the Alexan Foothills Specific Plan driveways. There are no incompatible uses nearby, such as a farm, which include the use of slow-moving vehicles. The impact on site distance would be less than significant.

Accordingly, the Alexan Foothills Specific Plan would not substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections). Impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

**Table 19-9 Year 2035 Conditions ADT Volumes and V/C Ratios**

Segment #	Roadway	Segment	Capacity <sup>1</sup>	Future Year 2035			Future Year 2035 Plus Specific Plan				Δ v/c Ratio	Increase	Significant Impact <sup>3</sup>
				ADT <sup>2</sup>	v/c Ratio	LOS	Project ADT	ADT <sup>2</sup>	v/c Ratio	LOS			
1	Duarte Road	west of Mayflower	36,000	23,900	0.67	B	96	24,000	0.67	B	0.000	0.40%	No
2		Mayflower to Magnolia	36,000	19,700	0.55	A	0	19,700	0.55	A	0.000	0.00%	No
3		Magnolia to Myrtle	36,000	19,800	0.55	A	193	20,000	0.56	A	0.010	0.98%	No
4		east of Myrtle	18,000	12,100	0.67	B	96	12,200	0.68	B	0.010	0.79%	No
5	Evergreen Avenue	Mayflower to Magnolia	18,000	2,500	0.14	A	582	3,100	0.17	A	0.030	23.12%	No
6		Magnolia to Myrtle	18,000	2,700	0.15	A	218	2,900	0.16	A	0.010	8.13%	No
7	Huntington Drive	Mayflower to Magnolia	36,000	28,600	0.80	C	193	28,800	0.80	C	0.000	0.67%	No
8	Mayflower Avenue	Magnolia to Myrtle	36,000	28,500	0.79	C	96	28,600	0.79	C	0.000	0.34%	No
9		north of Evergreen	36,000	16,900	0.47	A	291	17,200	0.48	A	0.010	1.73%	No
10		Evergreen to Duarte	36,000	16,700	0.46	A	96	16,800	0.47	A	0.010	0.58%	No
11	Magnolia Avenue	south of Duarte	18,000	7,900	0.44	A	0	7,900	0.44	A	0.000	0.00%	No
12		Huntington to Evergreen	18,000	8,100	0.45	A	678	8,800	0.49	A	0.040	8.34%	No
13	Myrtle Avenue	Evergreen to Duarte	18,000	7,700	0.43	A	461	8,200	0.45	A	0.020	5.97%	No
14		Huntington to Central	36,000	24,900	0.69	B	194	25,100	0.70	B	0.010	0.78%	No
15		Central to Duarte	36,000	24,000	0.67	B	24	24,000	0.67	B	0.000	0.10%	No
16	Magnolia Avenue	south of Duarte	36,000	24,100	0.67	B	96	24,200	0.67	B	0.000	0.40%	No

Source: LSA (2018). See Appendix J of this EIR.

1 Average daily traffic roadway segment capacity is determined as 9,000 vehicles per lane, per the City of Monrovia's General Plan Circulation Element (2012).

2 Average daily traffic volume is displayed with rounding to the nearest hundredths digit. However, the v/c ratio is calculated using the unrounded volume.

3 A significant impact occurs when the roadway link exceeds the acceptable LOS and the project-related traffic increases the ADT by 2.5 percent or more.

Δ = change

ADT = average daily traffic

LOS = level of service

v/c = volume-to-capacity

**Table 19-10 Program Scenario Year 2035 Conditions ADT Volumes and V/C Ratios**

Segment #	Roadway	Segment	Capacity <sup>1</sup>	Future Year 2035			Future Year 2035 Plus Maximum Potential Project Buildout				Δ v/c Ratio	Increase	Significant Impact? <sup>3</sup>
				ADT <sup>2</sup>	v/c Ratio	LOS	Project ADT	ADT2	v/c Ratio	LOS			
1	Duarte Road	west of Mayflower	36,000	23,900	0.67	B	118	24,100	0.67	B	0.000	0.49%	No
2		Mayflower to	36,000	19,700	0.55	A	0	19,700	0.55	A	0.000	0.00%	No
3		Magnolia to Myrtle	36,000	19,800	0.55	A	236	20,000	0.56	A	0.010	1.19%	No
4		east of Myrtle	18,000	12,100	0.67	B	118	12,300	0.68	B	0.000	0.97%	No
5	Evergreen Avenue	Mayflower to	18,000	2,500	0.14	A	708	3,200	0.18	A	0.040	28.13%	No
6		Magnolia to Myrtle	18,000	2,700	0.15	A	266	2,900	0.16	A	0.010	9.93%	No
7	Huntington	Mayflower to	36,000	28,600	0.80	C	236	28,900	0.80	C	0.000	0.82%	No
8		Magnolia to Myrtle	36,000	28,500	0.79	C	118	28,600	0.79	C	0.000	0.41%	No
9	Mayflower Avenue	north of Evergreen	36,000	16,900	0.47	A	354	17,200	0.48	A	0.010	2.10%	No
10		Evergreen to	36,000	16,700	0.46	A	118	16,800	0.47	A	0.010	0.71%	No
11		south of Duarte	18,000	7,900	0.44	A	0	7,900	0.44	A	0.000	0.00%	No
12	Magnolia Avenue	Huntington to	18,000	8,100	0.45	A	826	9,000	0.50	A	0.050	10.15%	No
13		Evergreen to	18,000	7,700	0.43	A	561	8,300	0.46	A	0.030	7.26%	No
14	Myrtle Avenue	Huntington to	36,000	24,900	0.69	B	236	25,100	0.70	B	0.010	0.95%	No
15		Central to Duarte	36,000	24,000	0.67	B	30	24,000	0.67	B	0.000	0.13%	No
16		south of Duarte	36,000	24,100	0.67	B	118	24,200	0.67	B	0.000	0.49%	No

Source: LSA (May 2018). See Appendix J of this EIR.

Notes:

1 Average daily traffic roadway segment capacity is determined as 9,000 vehicles per lane, per the City of Monrovia's General Plan Circulation Element (2012).

2 Average daily traffic volume is displayed with rounding to the nearest hundredths digit. However, the v/c ratio is calculated using the unrounded volume.

3 A significant impact occurs when the roadway link exceeds the acceptable LOS and the project-related traffic increases the ADT by 2.5 percent or more.

Δ = change

ADT = average daily traffic

LOS = level of service

v/c = volume-to-capacity

**Table 19-11 Driveway Access Analysis**

Intersection	Movement	Existing Plus Specific Plan				Cumulative Plus Specific Plan				
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	
3	Project Driveway 1/ Evergreen Avenue	WBL	7.7	A	7.9	A	7.7	A	7.9	A
6	Magnolia Avenue/ Project Driveway 2	NBL	7.9	A	8.3	A	7.9	A	8.4	A

Source: LSA (2018). See Appendix J of this EIR.  
 Notes:  
 LOS = level of service  
 NBL = Northbound left  
 WBL = Westbound left

**19.2.4 Impact Conclusions**

Mitigation measure MM T-1 would ensure that area roadway improvements are implemented to offset cumulative impacts on area intersections, including ramp intersections. With implementation of this measure, potentially significant traffic impacts associated with the Alexan Foothills Specific Plan would be reduced to less than significant levels.

List of Acronyms and Abbreviations	
Acronym/ Abbreviation	Full Phrase or Description
ADT	average daily traffic
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
EB	eastbound
HCM	Highway Capacity Manual
I-210	Interstate 210
ICU	Intersection Capacity Utilization
LOS	level of service
NBL	northbound left
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
TIA	Traffic Impact Analysis
v/c	volume-to-capacity
VMT	vehicle miles traveled
WB	westbound
WBL	westbound left

## References Cited

California Air Pollution Officers Association (CAPCOA) and California Air Districts  
2016 California Emissions Estimator Model (Cal EEMod)

City of Monrovia

2007 Traffic Study for the Proposed Amendment to the Land Use and Circulation Elements of the Monrovia General Plan.

2012 Circulation Element. November 6.

Institute of Transportation Engineers (ITE)

2012 Trip Generation Manual, 9<sup>th</sup> Edition

2017 Trip Generation Manual, 10<sup>th</sup> Edition

Los Angeles County Metropolitan Transportation Authority (METRO)

2010 Congestion Management Program

2018 METRO Adjacent Development Handbook. A Guide for Cities and Developers. May.

LSA

2018 Traffic Impact Analysis, 1625 Magnolia Avenue, Monrovia, Los Angeles County, California

2019 Addendum, 1625 Magnolia Avenue Traffic Study Cumulative (Year 2022) Analysis. June 26.

Southern California Association of Governments (SCAG)

2016 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Adopted April.

Transportation Research Board

2016 Highway Capacity Manual.

## 20. UTILITIES AND SERVICE SYSTEMS

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This EIR Chapter describes the existing setting for water supply, wastewater facilities, and solid waste management within the Project area. The Chapter includes the regulatory framework necessary to evaluate potential environmental impacts resulting from the Project, describes potential impacts that could result from the Project, and includes mitigation measures that would avoid or reduce those potential impacts.

The analysis in this chapter is based upon the City of Monrovia's Urban Water Management Plan (Stetson Engineers 2016), the City's Sewer System Management Plan (City of Monrovia 2016), a Water Capacity Study completed by Stetson Engineers (2019), a Wastewater Capacity Study completed by David Evans and Associates (2018), and various sub-pages available on the Monrovia's website at:

<http://www.cityofmonrovia.org/your-government/public-works>

Impacts on stormwater quality and stormwater-related facilities are discussed in EIR Chapter 13 (Hydrology and Water Quality).

### 20.1 SETTING

#### 20.1.1 Environmental Setting

##### **Wastewater Collection and Treatment**

Wastewater is treated at the San Jose Creek Water Reclamation Plant (WRP), located near the City of Industry. The San Jose Creek WRP currently treats 58.5 million gallons per day (mgd) and is permitted to treat up to 100 mgd (County Sanitation Districts of Los Angeles County [LACSD] 2019).

The majority of Monrovia's wastewater flows are conveyed to a 24-inch trunk sewer line at the intersection of Peck Road and Duarte Road, where the line runs along Peck Road in the southern area of Monrovia. The 24-inch trunk sewer line is operated by LACSD which has a capacity of 6.1 mgd and conveyed a peak flow of 3.3 mgd when last measured in 2013 (LACSD 2019).

The City's Public Services Department owns, operates, and maintains a sanitary sewer collection system including approximately 92 miles of City sewer lines with pipe sizes ranging in diameter from 6 to 24 inches (City of Monrovia 2018b). The City's two existing sewer main lines located near the Project (PSOMAS 2017, David Evans and Associates 2018) include:

- A 10-foot deep 24-inch Vitrified Clay Pipe (VCP) approximately six feet east of the center line of Mayflower Ave, which drains south along Mayflower Avenue until a turn eastward on Duarte Road, a turn southward at Peck Road, and then connection to the 24-inch trunk sewer line.
- An 8 to 10-foot deep 10-inch VCP sewer main approximately 10 feet west of the center line of Magnolia Avenue, which drains south along Magnolia Avenue until it connects to the 24-inch trunk sewer line.

The City of Monrovia is a member of the Consolidated Sewer Maintenance District (CSMD) of Los Angeles County administered and managed by the Los Angeles County Department of Public Works (LACDPW) which is responsible for maintaining the City's sewer pipelines.

## **Water Supply**

The City adopted an Urban Water Management Plan (UWMP) pursuant to the requirements of the State of California Urban Water Management Planning Act and the California Water Code to describe future water demands and future availability of the water supply sources used by the City (Stetson Engineers 2016). The UWMP currently does not include the Project. However, a WSA was completed for the Project as required by Water Code section 10910 (Stetson Engineers 2018) (Appendix K).

The Project area is within the Main San Gabriel Groundwater Basin, which is the primary source of water for Monrovia. The Main San Gabriel Basin freshwater storage capacity is estimated to be approximately 8.7 million acre-feet (AF). Approximately 1.0 million AF of this groundwater basin is actively managed, including importing supplemental water to recharge the basin to ensure reliability of the available groundwater supply. The City's water system is a "public water system" as defined by California Water Code Section 10912(c), which currently serves approximately 36,600 people with 9,600 service connections. The City maintains 111 miles of underground water pipelines, 12 local reservoirs, 7 pressure zones to deliver water to various parts of Monrovia, 19 booster pumps, and 5 booster stations (City of Monrovia 2018a).

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

The Main San Gabriel Basin is an adjudicated groundwater basin, where entities that use the groundwater basin as a water supply must pay their fair share of the cost to import supplemental water to recharge the basin. However, there is no limit on the quantity of groundwater that may be extracted, even during drought years. The Main San Gabriel Basin serves three water districts: Upper San Gabriel Valley Municipal Water District's (USGVMWD), San Gabriel Valley Municipal Water District's (SGVMWD), and Three Valleys Municipal Water District (TVMWD). The City of Monrovia is located within USGVMWD's service area. Basin-wide, the five-year average production of water from the groundwater basin has been 214,375 acre-feet per year (AFY).

The City pumps groundwater from its five active wells with a combined capacity of approximately 10,000 gallons per minute (gpm). The reliable pumping capacity of City wells is 9,700 AFY or 8.6 million gallons per day (MGD), which assumes that wells are operating at 60 percent capacity (Stetson 2018).

Since 1998, water demand in Monrovia has ranged from 5,810 AFY in 2002 to 9,706 AFY in 2003 (Stetson Engineers 2018), with an average consumption of 7,690 AFY over the last 20 years. Existing water demand from land uses in the Alexan Foothills Specific Plan area is 1.2 AFY (Stetson Engineers 2018). The UWMP and WSA project future water demands up to 7,037 AFY through the year 2040, starting at 6,635 AFY in 2019-2020.

The City can receive imported water from the Metropolitan Water District from the USG-7 connection. However, the City has not received water from this connection, at any point, over the last 20 years.

## **Solid Waste**

The City contracts with a private waste provider, Athens Services, for solid waste pick up and recycling services (City of Monrovia 2018c). As landfills throughout the region near capacity and the opportunities for new landfill sites become increasingly scarce, the need to reduce solid waste generation increases as hauling trash to distant locations has increased. In response to State directives for waste reduction, the City and its contracted hauler have coordinated efforts to reduce the volume of refuse entering the waste stream.

According to the CalRecycle Disposal Reporting System (CalRecycle 2018), Monrovia disposed 28,495 tons of solid waste in 2016, equating to approximately 4.2 pounds per day per resident. Solid waste was distributed over various landfills and recycling centers:

- Antelope Valley Public Landfill (72 tons—0.25%)
- Azusa Land Reclamation Co. Landfill (689 tons—2.42%)
- Chiquita Canyon Sanitary Landfill (363 tons—1.27%)
- El Sobrante Landfill (1,942 tons—6.82%)
- Frank. R. Bowerman Sanitary Landfill (1,075 tons—3.77%)
- Lancaster Landfill and Recycling Center (5 tons—0.2%)
- Mid-Valley Sanitary Landfill (13,177 tons—46.2%)
- Olinda Alpha Sanitary Landfill (2,958 tons—10.3%)
- San Timoteo Sanitary Landfill (5,294 tons—18.6%)
- Simi Valley Landfill & Recycling Center (256 tons—0.90%)
- Sunshine Canyon City/County Landfill (2,310 tons—8.12%)
- Victorville Sanitary Landfill (354 tons—1.24%)

CalRecycle projected landfill capacity countywide in their Remaining Lifetime Landfill Capacity Analysis for Los Angeles County (CalRecycle 2011). Under a “medium growth” scenario, CalRecycle projects 32 million tons of remaining capacity in 2025. Under a “medium growth” scenario, the following assumptions apply: (1) solid waste amounts increase due to population growth and medium economic growth; (2) no new facilities are built beyond those already planned; (3) no increase in recycling; and (4) current State regulations and policies continue without change.

### **20.1.2 Regulatory Setting**

#### **Wastewater Collection and Treatment**

##### **State**

**California Plumbing Code, Chapter 10.** Chapter 10 of the California Plumbing Code has been adopted by the City of Monrovia and provides the Building Official with legal authority to require installation of interceptors/clarifiers where waste flow conditions require proper handling to protect the sewer system and the public (commonly at establishments that generate grease, oil, grit, acids, alkaline or flammable wastes).



## Water Supply

### *State*

**Department of Water Resources.** The California Department of Water Resources (DWR) is responsible for the management and regulation of water usage, including the delivery of water to two-thirds of California's population through the nation's largest State-built water development and conveyance system, the State Water Project. Working with other agencies and the public, DWR develops strategic goals and near-term and long-term actions to conserve, manage, develop, and sustain California's watersheds, water resources, and water management systems. DWR also works to prevent and respond to floods, droughts, and catastrophic events that would threaten public safety, water resources and management systems, the environment, and property.

**California Safe Drinking Water Act.** The Safe Drinking Water Act (SDWA), administered by the U.S. Environmental Protection Agency (EPA) in coordination with the California Department of Public Health (CDPH), is the main Federal law that ensures the quality of drinking water. Under SDWA, EPA sets standards for drinking water quality and oversees water suppliers who implement those standards.

**Urban Water Management Planning Act.** In 1983, the California legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 AF annually, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an UWMP at least once every 5 years and submit it to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24 or Division 26 of the California Water Code, or receive drought assistance from the State, until the UWMP is submitted and deemed complete pursuant to the Act.

**Senate Bills 610 and 221, Water Supply Assessment and Verification.** Senate Bills (SB) 610 and 221 amended State law to improve the link between the information on water supply availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability (i.e., a Water Supply Assessment or WSA) to be provided to city and county decision-makers prior to approval of development projects involving greater than 500 dwelling units. Both statutes require this detailed information to be included in the administrative record. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental document for certain projects as defined in Water Code 10912 subject to CEQA. Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply.

**Statewide Water Conservation Act of 2009 (Senate Bill X7-7).** In November 2009, the California State legislature passed SB X7-7 addressing water conservation. In general, SB X7-7 requires a 20 percent reduction in per capita urban water use by 2020, with an interim target of 10 percent in 2015. The legislation requires urban water users to develop consistent water use targets and to use those targets in their UWMPs.

### *Local*

**City of Monrovia 2015 Urban Water Management Plan.** The City of Monrovia is a water

supplier and is required to prepare an UWMP in accordance with the California Urban Water Management Planning Act. The Act requires every “urban water supplier” to prepare and adopt a Plan to provide a legal framework for long-term water management to ensure sufficient water supplies to meet existing and future demands. It also requires periodic review of the Plan by the City at least once every five years and any amendments or changes which are indicated by the review. The latest UWMP was prepared in 2015 by the City (City of Monrovia 2016).

**City of Monrovia Landscape Regulations.** In response to Executive Order (EO) B-29-15 to impose urban water use restrictions, in 2018 the City of Monrovia implemented a Landscape Ordinance to regulate:

- New residential and non-residential construction projects with a landscape area totaling 500 square feet (sf) or more; and
- Rehabilitated residential and non-residential landscape projects with a landscape area totaling 2,500 sf or more.

In accordance with the State’s Model Water Efficient Landscape Ordinance (MWELo), a project applicant shall submit a complete Landscape Documentation Package containing a Water Efficient Landscape Application containing a licensed landscape professional's statement that the proposed design and documentation package complies with State’s regulations regarding water conservation.

## **Solid Waste Disposal**

### ***State***

**California Department of Resources Recycling and Recovery (CalRecycle; formerly the California Integrated Waste Management Board).** CalRecycle oversees, manages, and monitors waste generated in California. It provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and Senate Bill (SB) 1016.

**Assembly Bill (AB) 939.** AB 939 (Public Resources Code 41780) requires cities and counties to prepare Integrated Waste Management Plans (IWMPs) and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements (SRRE) as part of their IWMPs. These Elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

**Senate Bill (SB) 1016.** SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 also changed the CalRecycle review process for each municipality’s IWMP. The CalRecycle Board reviews a jurisdiction’s compliance with diversion rate targets in accordance with a specified schedule. Beginning January 1, 2018, the Board will be required to review a jurisdiction’s source Reduction and Recycling Element and Hazardous Waste Element every two years.

## **20.2 ENVIRONMENTAL EFFECTS**

This Section describes potential impacts related to utilities and service systems that could result from the Project. The Section also recommends mitigation measures as needed to reduce significant impacts. A program-level analysis was conducted for ZCA Areas A and C and a project-level analysis was conducted for the Alexan Foothills Specific Plan area (ZCA Area B). The level of analysis conducted for the GPA depends upon whether the analysis is focusing on ZCA Areas A and C, the Alexan Foothills Specific Plan, or both.

### **20.2.1 Significance Criteria**

Based on the CEQA Guidelines, Appendix G: Items XIX (a) through (e), implementation of the Project would result in a significant impact related to utilities if it would:

- (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 of which would cause significant environmental effects;
- (b) Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- (c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- (d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;  
or
- (e) Fail to comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

In addition, based on the CEQA Guidelines, Appendix G: X (b) and X (e), implementation of the Project would have a significant impact on groundwater resources if it would:

- (b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; or
- (e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

### **20.2.2 Analysis Methodology**

The methodology for evaluating potential environmental impacts related to utilities and service systems followed this basic sequence:

- (1) Background reports, along with information provided by other governmental organizations and local private utilities were evaluated to identify existing environmental conditions and problems related to utilities and service systems.

- (2) The CEQA Statute and Guidelines, including Appendix G (Environmental Checklist Form), were consulted to identify environmental impact topics and issues that should be addressed in the EIR. In part, this process resulted in the significance criteria listed in subsection 20.2.1 above.
- (3) Potential impacts to utilities and service systems were evaluated by comparing projected increased water use, generation of wastewater, and solid waste generation with existing capacity and availability of utility services to determine if a significant impact would occur.
- (4) For potential environmental impacts, mitigation measures were designed to avoid or reduce each impact to a less than significant level, where possible.

### **20.2.3 Environmental Impacts**

#### **IMPACT UTIL-1 WASTEWATER COLLECTION AND TREATMENT**

##### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

The Project's anticipated population increase would cause an increase in the amount of wastewater delivered to the San Jose Creek Water Reclamation Plant. Table 20-1 presents an estimated increase of 0.087 mgd in wastewater generated by new development under the Project once existing structures are demolished.

**Table 20-1 Estimated Wastewater Generated by Project**

Land Use	Wastewater Generation Rate <sup>(A)</sup>	Total Wastewater Generation (gpd)
<b>Alexan Foothills Specific Plan</b>		
436 DUs	156 gpd per DU	68,016
Commercial space associated with four live/work units (1,561 sf)	100 gpd per 1,000 sf	156.1
Two pools/spas <sup>(B)</sup>		5,714
<b>Subtotal</b>		<b>73,886.1</b>
<b>ZCA Areas A and C</b>		
82 DUs	156 gpd per DU	12,792
<b>TOTAL</b>		<b>86,678.1</b>

Notes:  
 DU dwelling unit  
 sf square feet  
 (A) Wastewater generation rates are from County Sanitation Districts of Los Angeles County, Table 1, Loadings by Each Class of Land Use (<https://lacsdc.org/civicax/filebank/blobdload.aspx?blobid=3531>) (downloaded in July 2019)  
 (B) A competition pool, 50 meters by 25 yards (22.86 m), with an average pool depth of 6 feet (1.83 m), has a total pool volume of 2,091.69 m<sup>3</sup>, or 552,566 gallons. It is estimated that the two pools and spas proposed in the Alexan Foothills Specific Plan would comprise the size of two competition pools. Replenishment of pool water with potable water is required from time to time to prevent the buildup of unacceptable levels of chloramines. Discharge of water from pools is required to be discharged to the sanitary sewer. The water filtration systems for the proposed new pools have not been designed to date, however, it is estimated that approximately 20,000 gallons of potable water per week per pool/spa complex, or 5,714 gpd would be required to replenish the water; and a commensurate amount of water would need to be discharged to the sanitary sewer each week.

This wastewater amount represents less than one percent of the remaining capacity at the San Jose Creek Water Reclamation Plant and would not require the construction of new facilities. Therefore, the Project would have a less than significant impact on the San Jose Creek Water Reclamation Plant and would not exceed wastewater treatment requirements of the Regional Water Quality Control Board. The Project would not result in a determination by the wastewater treatment provider serving the Project area that it does not have adequate capacity to serve the Project's projected demand in addition to its existing commitments.

In addition, the City of Monrovia's Department of Public Works commissioned a wastewater capacity study to evaluate the cumulative impacts of proposed new developments in the Project area on the size capacity of the City's sewer lines adjacent to the Project (David Evans and Associates 2018). The study concluded that one small segment of the City's sewer line along Magnolia Avenue, and two small segments of the City's sewer line along Duarte Road, would slightly exceed the LACSD's threshold for determining whether the capacity of a pipeline is full (i.e., the depth of flow over the pipe diameter), however, the remaining pipeline segments are projected to remain at capacity. Therefore, the City's wastewater capacity study does not recommend any additional wastewater infrastructure to serve the Project or other proposed projects in the area (David Evans and Associates 2019). Therefore, impacts of the Project on the capacity of the City's sewer lines would be less than significant and would not require mitigation measures.

A final determination by the City of Monrovia's Department of Public Works that it can provide wastewater service to the Project in compliance with LACSD requirements, however, would be required prior to issuance of building permits or recordation of final maps for the Alexan Foothills Specific Plan and for future developments in ZCA Areas A and C. Therefore, mitigation measure MM UT-1 is required to ensure that the City provides a "Can and Will Serve" letter to provide wastewater service for the Alexan Foothills Specific Plan and future development in ZCA Areas A and C. With implementation of this measure, potentially significant impacts would be reduced to less than significant levels.

## **Mitigation Measures**

Mitigation Measure MM UT-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

**MM UT-1.** Prior to issuance of building permits or the approval of a final map, whichever occurs first, the applicant shall agree to the conditions as outlined herein and provide the following: a) provide a "Can and Will Serve" letter by the City of Monrovia's Department of Public Works to provide wastewater service to the development indicating the feasibility and conditions of providing service to the development, and b) identify and show on the site plans and tentative map the proposed layout and design of the development and how it will accomplish City Department of Public Works' conditions of approval for the development. **Requirements and Timing:** A Can and Will serve letter for wastewater service shall be obtained prior to issuance of building permits or approval of a final map, whichever occurs first. **Monitoring:** City staff shall confirm issuance of the Can and Will Serve letter for wastewater service prior to issuance of building permits or approval of a final map, whichever occurs first.

## **IMPACT UT-2 WATER SUPPLY AND GROUNDWATER RESOURCES**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Expanded conservation practices such as low water use toilets, appliances and gardening, and increased use of recycled water would likely improve the efficiency of new uses established by the Project as compared to the existing uses. The increase in mixed-use development typically results in lower household water use as lawn and garden irrigation practices are less compared to single family homes. Nevertheless, water use would be expected to rise with the anticipated increase in population and new landscaped areas. Water is a scarce resource, and droughts are common in southern California.

According to the WSA, indoor water use under the Alexan Foothills Specific Plan area is estimated to be 55 gallons per capita per day (GPCD). The WSA conservatively assumes a population of 1,090 individuals under the Alexan Foothills Specific Plan (higher than the actual projected population estimate of 942 - see Chapter 17, Population and Housing), resulting in a per capita water demand of approximately 67 AFY (55 GPCD x 1,090 x 365 days in a year/325,851 gallons per acre-foot).

The Alexan Foothills Specific Plan would also have just over an acre of irrigated landscaped area. Considering irrigation efficiency and evapotranspiration, the WSA estimates the annual total water use for irrigation is 2.7 AFY. Total water use for the Alexan Foothills Specific Plan is projected to be 70 AFY according to the WSA. However, the WSA did not include the water demand associated with replenishment of water in the two proposed pools and spas under the Alexan Foothills Specific Plan. Replenishment of pool and spa water would result in a total estimated water demand of 2,085,610 gallons per year (see Table 20-1), for 6.4 AFY. This would result in a net increase of 76.4 AFY in water demand in the Alexan Foothills Specific Plan area.

In addition to the Alexan Foothills Specific Plan, ZCA Areas A and C could accommodate up to 227 additional people from 82 additional units (see Chapter 17, Population and Housing). The 2015 UWMP states that the City's water demand per capita in 2015 was 153 GPCD (including indoor use and landscaping). As such, it is expected that buildout of ZCA Areas A and C would use approximately 34,731 gallons of water per day (0.11 AF), or approximately 39 AFY. This is likely a worst-case scenario, as future development would likely result in multi-family units and relatively small irrigated areas suggesting that the amount of water consumed would likely be less than the City's GPCD. In addition, this does not factor in existing water use in the area.

Therefore, the conservative estimate for the Project's combined increase in water demand would be 115.4 AFY. Based upon the analysis in the WSA, the total water demand in the City with the Alexan Foothills Specific Plan for the year 2040 is 7,106 AFY. The total Project, therefore, would result in a total water demand in the City of 7,151.4 AFY (including the pools/spas under the Alexan Foothills Specific Plan and future development of ZCA Areas A and C). The WSA concludes that the City would have a sufficient supply of 9,700 AFY to support the Project and City demand, in both single and multiple dry years. Therefore, the Project would not require new or expanded water supply entitlements and would have a less than significant impact on water supply.

The City conducted a water capacity study to determine if any additional water infrastructure improvements would be required to serve the Alexan Foothills Specific Plan and future development in the area including future buildout in ZCA Areas A and C (Stetson Engineers 2019). The study concluded that additional potable water infrastructure would be required to serve the Project and other nearby development. Specifically, additional booster pump capacity at the City's Forebay Pump Station is recommended in addition to 980 feet of pipeline

replacements or upgrades along Magnolia Avenue. These improvements would occur within a developed, urbanized area and would not result in any significant environmental impacts. Under mitigation measure MM UT-2, payment of in-lieu fees would be required to ensure payment of the fair-share of required improvements and to reduce impacts to less than significant levels.

A final determination by the City of Monrovia's Department of Public Works that it can provide water service to the Project, however, would be required prior to issuance of building permits or recordation of final maps for the Alexan Foothills Specific Plan and for future developments in ZCA Areas A and C. Therefore, mitigation measure MM UT-3 is required to ensure that the City provides a "Can and Will Serve" letter to provide water service for the Alexan Foothills Specific Plan and future development in ZCA Areas A and C. With implementation of this measure, potentially significant impacts would be reduced to less than significant levels.

## **Mitigation Measures**

Mitigation measures MM UT-2 and MM UT-3 are applicable to the Alexan Foothills Specific Plan as well as to future developments in ZCA Areas A and C.

**MM UT-2.** The applicant for development shall pay fair-share in-lieu fees for completion of upgrades to the nearby water system to support the development. Improvements will include the addition of one booster pump and upgrade of 980 feet of pipeline along Magnolia Avenue between Duarte Road and Evergreen Avenue. **Requirement and Timing:** In lieu fees shall be paid prior to issuance of building permits. **Monitoring:** City staff shall confirm payment of in lieu fees prior to issuance of building permits.

**MM UT-3.** Prior to issuance of building permits or the approval of a final map, whichever occurs first, the applicant shall agree to the conditions as outlined herein and provide the following: a) provide a "Can and Will Serve" letter by the City of Monrovia's Department of Public Works to provide water service to the development indicating the feasibility and conditions of providing service to the development, and b) identify and show on the site plans and tentative map the proposed layout and design of the development and how it will accomplish City Department of Public Works' conditions of approval for the development. **Requirements and Timing:** A Can and Will serve letter for water service shall be obtained prior to issuance of building permits or approval of a final map, whichever occurs first. **Monitoring:** City staff shall confirm issuance of the Can and Will Serve letter for water service prior to issuance of building permits or approval of a final map, whichever occurs first.

## **IMPACT UT-3 SOLID WASTE**

### **GPA, ZCA Areas A and C, and Alexan Foothills Specific Plan**

Using a 2016 per capita waste generation rate of 4.2 pounds per resident per day, the approximate 1,169 residents that would live in the Project area would result in a generation of approximately of 896 tons of solid waste annually. This is likely a worse-case scenario as per-capita waste generation rates are expected to continue to decline through various solid waste management practices.

As stated above, solid waste generated by the City of Monrovia has been disposed of at the following facilities, which would also be used for waste generated by the Project:

- Antelope Valley Public Landfill
- Azusa Land Reclamation Co. Landfill
- Chiquita Canyon Sanitary Landfill
- El Sobrante Landfill
- Frank. R. Bowerman Sanitary Landfill
- Lancaster Landfill and Recycling Center
- Mid-Valley Sanitary Landfill
- Olinda Alpha Sanitary Landfill
- San Timoteo Sanitary Landfill
- Simi Valley Landfill & Recycling Center
- Sunshine Canyon City/County Landfill
- Victorville Sanitary Landfill

As stated above, CalRecycle projects 32 million tons of remaining capacity in 2025. Therefore, generation of 896 tons of solid waste would represent a very small percentage of the County's landfill capacity, and landfills with sufficient permitted capacity are available to serve the Project's solid waste disposal needs. Therefore, the Project would have a less than significant impact on landfill capacity. In addition, the City, working with private providers, will continue to implement a variety of solid waste reduction, recycling, and re-use measures to meet its obligation under AB 939. These efforts will be coordinated with waste management programs; therefore, future landfill diversion rates may further improve.

Buildout of the Alexan Foothills Specific Plan would involve the demolition of approximately 65,190 sf of existing structures in the area, and buildout of ZCA Areas A and C would also likely result in demolition of existing structures. However, a large percentage of construction and demolition (C&D) debris can be recycled. The City of Monrovia has a C&D Recycling Program under its IWMP, requiring individual project applicants to prepare a Waste Management Plan for individual projects and recycling of at least 50 percent of C&D waste as stipulated in standard condition SC UT-1. The City must review and approve Waste Management Plans for individual projects, and it requires submittal of Waste Management Reports, including receipts or weight tickets to document recycling of materials. The Project would comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, with implementation of this program, buildout of the Project would result in less than significant solid waste impacts due to construction and demolition activities.

## Standard Conditions

Standard condition SC UT-1 is applicable to the Alexan Foothills Specific Plan and future developments within ZCA Areas A and C.

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



building permits; City staff shall confirm approval of the Waste Management Plan prior to issuance of building permits and shall confirm compliance with the Waste Management Plan prior to sign off on construction.

### **Mitigation Measures**

No mitigation measures are required.

### **20.2.4 Impact Conclusions**

Sufficient potable water, wastewater capacity, and landfill capacity exists to accommodate increased demands with construction and implementation of the Project. Mitigation measures MM UT-1 and MM UT-3 would ensure that can and will serve letters are issued for water and wastewater service for all development under the Project, and mitigation measure MM UT-2 would ensure that adequate water infrastructure is in place in the Project area to accommodate the new planned growth. Project impacts on utilities would be less than significant with the incorporation of standard conditions and mitigation measures MM UT-1 through MM UT-3.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym/ Abbreviation</b>	<b>Full Phrase or Description</b>
AB	Assembly Bill
AF	acre-feet
AFY	acre-feet per year
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CSMD	Consolidated Sewer Management District
DWR	Department of Water Resources
EIR	Environmental Impact Report
EO	Executive Order
EPA	United States Environmental Protection Agency
GPCD	gallons per capita per day
GPA	General Plan Amendment
IWMP	Integrated Waste Management Plan
LACDPW	Los Angeles County Department of Public Works
LACSD	Sanitation Districts of Los Angeles County
m	meters
mgd	million gallons per day
MWELO	Model Water Efficient Landscape Ordinance
SB	Senate Bill
SDWA	Safe Drinking Water Act
SGVMWD	San Gabriel Valley Municipal Water District
SRRE	Source Reduction and Recycling Element
TVMWD	Three Valleys Municipal Water District
USGVMWD	Upper San Gabriel Valley Municipal Water District
UWMP	Urban Water Management Plan
VCP	Vitrified Clap Pipe
WRP	Water Reclamation Plant
WSA	Water Supply Assessment

ZCA	Zoning Code Amendment
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### References Cited

#### CalRecycle

- 2011 Remaining Lifetime Landfill Capacity Analysis for Los Angeles County. Sacramento, CA. Website accessed on May 22, 2018. <http://www.calrecycle.ca.gov/FacI/Facility/Charts/DisposalGap/19DispLife.pdf>.
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#### City of Monrovia

- 2016 Sewer System Management Plan (Final Report). Monrovia, CA. Website accessed on May 21, 2018, <http://www.cityofmonrovia.org/home/showdocument?id=4776>.
- 2018a Water System. Monrovia, CA. Website accessed on May 15, 2018. <http://www.cityofmonrovia.org/your-government/public-works/water>.
- 2018b Sewer. Monrovia, CA. Website accessed on May 21, 2018. <http://www.cityofmonrovia.org/your-government/public-works/sewer>.
- 2018c Athens Trash Services Overview. Monrovia, CA. Website accessed on May 21, 2018. <http://www.cityofmonrovia.org/your-government/public-works/trash-services/athens-trash-services>.

#### County Sanitation Districts of Los Angeles County (LACSD)

- 2019 Comment Letter for Tentative Parcel Map 82326. April 24.

#### David Evans and Associates, Inc.

- 2018 Sewer Capacity Analysis – Multi Development Areas. Prepared for the Department of Public Works, City of Monrovia. May 29.

#### PSOMAS

- 2017 Due Diligence Report: 1625 Magnolia Avenue. Santa Clarita, CA.

#### Stetson Engineers, Inc. (Stetson Engineers)

- 2016 City of Monrovia 2015 Urban Water Management Plan (UWMP). Prepared for the City of Monrovia. May.
- 2018 Water Supply Assessment – Alexan Monrovia Project. Prepared for the City of Monrovia. September.
- 2019 Water Capacity Study for Proposed Station Square Transit Village Projects. Prepared for the City of Monrovia. January 15.

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## 21. ALTERNATIVES

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Section 15126.6 of the CEQA Guidelines requires an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The Section also states that the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the basic project objectives, or would be more costly. The Project does not result in significant and unavoidable environmental impacts. Accordingly, this Chapter focuses on Project alternatives that could potentially reduce environmental impacts as compared to the Project, while still meeting the Project objectives.

Pursuant to Section 15126.6, this Chapter describes three alternatives to the Project and compares their impacts to the Project. Pursuant to the CEQA Guidelines, the ability of the alternatives to meet the basic project objectives is also described, and the "environmentally superior" alternative among the four is identified.

In accordance with CEQA Guidelines Section 15126.6(a), this EIR does not evaluate every conceivable alternative. A reasonable range of feasible alternatives that will allow decision-makers to make a reasoned choice and that meet most of the project objectives has been evaluated. The project objectives are as follows below.

The objectives for the PD GPA are as follows:

- Objective GPA-1. Create a cohesive and complementary land use plan that provides additional opportunities for transit oriented development opportunities to support Station Square Transit Village (PD-12).

The objectives for the PD ZCA are as follows:

- Objective ZCA-1. Provide flexibility in land use types and intensities that will allow future development to respond to changes in the marketplace over time.
- Objective ZCA-2. Provide land use guidance for three distinct areas (Areas A, B, and C) within the Planned Development Area PD-27: Station Square West area.

The objectives for the Alexan Foothills Specific Plan are as follows:

- Objective SP-1. Provide more opportunities for high-density housing near transit within Area B and the City by increasing density to 54 units per acre to meet the goals of the City's Housing Element.
- Objective SP-2. Broaden the type of housing options in the City by creating opportunities for modern, attractive, multi-family residential development.

- Objective SP-3. Accommodate a walkable urban form in the City by improving the pedestrian environment with active, small-format ground-floor public spaces, accessible sidewalks and pathways, and pedestrian amenities.
- Objective SP-4. Improve multi-modal accessibility, connectivity, and safety by providing public parking for METRO's Monrovia Gold Line Station, providing accessible pathways to enable safe access to the METRO station, and by promoting bicycle use by providing convenient bicycle amenities and storage options.
- Objective SP-5. Improve the physical character and aesthetic appeal of the area with the gradual introduction of new developments that include attractive architectural styles, landscaping, connectivity and walkability, public art, and welcoming and unified gateway elements.
- Objective SP-6. Integrate open space and resident amenities by integrating plazas and small gathering spaces, such as rooftop decks.

The following alternatives have been evaluated in comparison to the Project:

- Alternative 1: No Project Alternative
- Alternative 2: Buildout of Project Area Under Current Zoning
- Alternative 3: Reduced Specific Plan

Table 21-1 provides an overview of the development potential for the Project and the three alternatives.

**Table 21-1 Summary Statistics for Project Alternatives**

Project Component	Size (Acres)	Existing Uses (Square feet, Dwelling units)	Existing General Plan & Zoning Designations	Proposed Uses (Square feet, Dwelling units)	Proposed General Plan & Zoning Designation
Project	9.63	Light Industrial (incl warehouse, office, accessory structures) (approx. 80,870 sf)	General Plan Designation and Zoning: Manufacturing	Multi-Family Residential  518 DU under Full Buildout	General Plan: Planned Development (PD-27: Station Square West)  Zoning: Planned Development (PD-27) with Alexan Foothills Specific Plan
		Single Family Residential Units (6,088 sf.; 5 DUs)			
		Church & Accessory			

**Table 21-1 Summary Statistics for Project Alternatives**

Project Component	Size (Acres)	Existing Uses (Square feet, Dwelling units)	Existing General Plan & Zoning Designations	Proposed Uses (Square feet, Dwelling units)	Proposed General Plan & Zoning Designation
		Structures (approx. 6,630 sf)			
Alternative 1: No Project Alternative	9.63		General Plan Designation and Zoning: Manufacturing	None Proposed	General Plan Designation and Zoning: Manufacturing
Alternative 2: Buildout of Project Area Under Current Zoning	9.63	Same as Alternative 1	General Plan Designation and Zoning: Manufacturing	Mobile Homes and/or Industrial and Commercial	General Plan Designation and Zoning: Manufacturing
Alternative 3: Reduced Specific Plan	9.63	Same as Alternative 1	General Plan Designation and Zoning: Manufacturing	Multi-Family Residential  482 DU under Full Buildout	General Plan: Planned Development (PD-27: Station Square West)  Zoning: Planned Development (PD-27) with Alexan Foothills Specific Plan
Notes: DU dwelling units SF square feet					

A detailed description of each alternative and comparison of impacts on each issue area is provided below. Table 21-2 summarizes impacts of each alternative relative to the Project.

**Table 21-2 Summary of Impacts Under Alternatives Relative to the Project**

Issue Area	Project	Alternatives		
		Alternative 1: No Project Alternative	Alternative 2: Buildout of Project Area Under Current Zoning	Alternative 3: Reduced Specific Plan
Aesthetics and Visual Resources	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Greater than Proposed Project: Alternative 2 would potentially result in more industrial units and mobile homes in the Project area than the Project.	Similar to proposed Project: Alternative 3 would result in construction of buildings slightly lower in height.
Agricultural and Forest Resources	No Impact	Same as Project.	Same as Project	Same as Project
Air Quality	Less Than Significant with Mitigation	Less than Project: No Project Alternative would involve less	Greater than Project: Alternative 2 would generate more trips.	Less than Project: Alternative 3 would generate less trips.

<b>Table 21-2 Summary of Impacts Under Alternatives Relative to the Project</b>				
<b>Issue Area</b>	<b>Project</b>	<b>Alternatives</b>		
		<b>Alternative 1: No Project Alternative</b>	<b>Alternative 2: Buildout of Project Area Under Current Zoning</b>	<b>Alternative 3: Reduced Specific Plan</b>
	Incorporated	development than under the Project.		
Biological Resources	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Same as Project: Overall area developed would not change under Alternative.	Same as Project: Overall area developed would not change under Alternative.
Cultural Resources and Tribal Resources	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Same as Project: Overall area developed would not change under Alternative.	Same as Project: Overall area developed would not change under Alternative.
Geology and Soils	Less Than Significant	Less than Project: No Project Alternative would involve less development than under the Project.	Same as Project: Overall area developed would not change under Alternative.	Same as Project: Overall area developed would not change under Alternative.
Greenhouse Gas Emissions and Energy Consumption	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Greater than Project: Alternative 2 would generate more trips.	Less than Project: Alternative 3 would generate less trips.
Hazards and Hazardous Materials	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Same as Project: Overall area developed would not change under Alternative.	Same as Project: Overall area developed would not change under Alternative.
Hydrology and Water Quality	Less Than Significant	Less than Project: No Project Alternative would involve less development than under the Project.	Greater than Project: This alternative is expected to result in slightly more impervious surfaces than the Project due to more industrial units.	Same as Project: Overall area developed would not change under Alternative.
Land Use and Planning	Less Than Significant	Greater than Project: Numerous policies and objectives to ensure that new development would be compatible and integrated with established land use patterns would not be implemented. The benefits of improving transit use and walkability would not be implemented. Alternative 2 would be less effective at meeting the goals of the Housing Element.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.	Greater than Project: Alternative 3 would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.
Mineral Resources	No Impact	Same as Project.	Same as Project.	Same as Project.
Noise	Less Than Significant with	Less than Project: No Project Alternative	Greater than Project: Alternative 2 would	Less than Project: Alternative 3 would

<b>Table 21-2 Summary of Impacts Under Alternatives Relative to the Project</b>				
<b>Issue Area</b>	<b>Project</b>	<b>Alternatives</b>		
		<b>Alternative 1: No Project Alternative</b>	<b>Alternative 2: Buildout of Project Area Under Current Zoning</b>	<b>Alternative 3: Reduced Specific Plan</b>
	Mitigation Incorporated	would involve less development than under the Project.	generate more trips.	generate less trips.
Population and Housing	Less Than Significant	Greater than Project: There would be less new housing to meet the community and regional need for housing.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.
Public Services and Recreation	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Less than Project: Alternative would result in less housing and therefore, less demand on public services and recreational facilities.	Less than Project: Alternative 3 would involve less demand on public services and recreational facilities.
Transportation and Circulation	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Greater than Project: Alternative 2 would generate more trips.	Less than Project: Alternative 3 would involve fewer trips than under the Project.
Utilities and Service Systems	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Similar to Project: Alternative would result in less housing but more potential industrial square footage. Therefore, impacts would be similar.	Less than Project: Alternative 3 would involve less development than under the Project.
Land Use and Planning	Less Than Significant	Greater than Project: Numerous policies and objectives to ensure that new development would be compatible and integrated with established land use patterns would not be implemented. The benefits of improving transit use and walkability would not be implemented. Alternative 2 would be less effective at meeting the goals of the Housing Element.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.	Greater than Project: Alternative 3 would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.
Mineral Resources	No Impact	Same as Project.	Same as Project.	Same as Project.
Noise	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under	Greater than Project: Alternative 2 would generate more trips.	Less than Project: Alternative 3 would generate less trips.



<b>Table 21-2 Summary of Impacts Under Alternatives Relative to the Project</b>				
Issue Area	Project	Alternatives		
		Alternative 1: No Project Alternative	Alternative 2: Buildout of Project Area Under Current Zoning	Alternative 3: Reduced Specific Plan
		the Project.		
Population and Housing	Less Than Significant	Greater than Project: There would be less new housing to meet the community and regional need for housing.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.	Greater than Project: Alternative would result in less housing in the City than the Project, and therefore, would be less effective at meeting the City's housing goals outlined in the Housing Element.
Public Services and Recreation	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Less than Project: Alternative would result in less housing and therefore, less demand on public services and recreational facilities.	Less than Project: Alternative 3 would involve less demand on public services and recreational facilities.
Transportation and Circulation	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Greater than Project: Alternative 2 would generate more trips.	Less than Project: Alternative 3 would involve fewer trips than under the Project.
Utilities and Service Systems	Less Than Significant with Mitigation Incorporated	Less than Project: No Project Alternative would involve less development than under the Project.	Similar to Project: Alternative would result in less housing but more potential industrial square footage. Therefore, impacts would be similar.	Less than Project: Alternative 3 would involve less development than under the Project.

## 21.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

According to Section 15126.6(e)(2) of the CEQA Guidelines, the evaluation of alternatives in an EIR shall include a “no project” scenario. A “no project” scenario consists of the existing physical setting and “...what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Under this alternative, the GPA and ZCA would not occur and the Alexan Foothills Specific Plan would not be adopted. The Project area would continue with a land use designation of Manufacturing under the City's Land Use Element. This land use designation allows for light manufacturing and limited heavy manufacturing uses. Additionally, under the current zoning, the entire Project area would continue to be designated as Manufacturing where industrial uses are allowed in this zone (with some uses requiring a conditional use permit). Office and institutional uses are also allowed in this zone, with the exception of cemeteries and government buildings. Under this zoning, the only residential uses that are allowed are mobile home parks with a conditional use permit.

Under this alternative, no buildout would occur in the Alexan Foothills Specific Plan area or ZCA Areas A and C, and all existing structures would remain. Specifically, three light industrial

structures, one legal nonconforming residential unit, one religious building and associated trailers, one commercial office building, and one asphalt covered storage lot, all constructed between 1942 and 1987, would remain.

Alternative 1 would not incorporate the smart growth guiding principles or objectives of the Project directed at developing a sustainable community by increasing walkability and accessibility for bicyclists, providing a greater range of transportation and housing choices through transit oriented development and mixed-use development, and prioritizing infill and redevelopment rather than development of open space. These guiding principles and objectives help mitigate overall impacts on air quality, global climate change, and transportation and circulation within the City. Also, existing structures would remain on the property and would therefore not include current techniques in achieving sustainability such as modern fixtures for water conservation and use of green building technology.

## **Project Objectives**

Overall, Alternative 1 would involve less development within the City than under the Project. However, under Alternative 1, none of the project objectives would be met.

### **21.1.1 Comparison of Impacts**

#### **Aesthetics and Visual Resources**

Alternative 1 would involve less overall development than the Project. Therefore, impacts on aesthetics and visual resources would be lower than the Project. There would be no visual impacts in the Alexan Foothills Specific Plan area, however, existing structures would remain in perpetuity and would continue to become inconsistent and incompatible with the character of planned development in areas adjacent to the Project area (such as the Station Square Transit Village) utilizing modern architectural styles and details.

#### **Agricultural and Forest Resources**

There are no agricultural or forest resource uses in the Project area. As such, there would be no impact under the Project and under Alternative 1.

#### **Air Quality**

Alternative 1 would involve less overall development than the Project. Therefore, localized impacts on air quality would be lower under Alternative 1 than the Project. However, the overall reduction in vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized.

#### **Biological Resources**

Alternative 1 would involve less overall development than the Project. However, the benefits of facilitating in-fill residential development and mixed uses in the City to reduce development sprawl into open space would not be realized.

## **Cultural Resources and Tribal Cultural Resources**

There are no known archaeological resources, Tribal Cultural Resources, significant historic structures, or paleontological resources in the Project area. However, Alternative 1 would involve less construction and grading than the Project. Therefore, Alternative 1 would have less risk of inadvertent discovery of archaeological resources, Tribal Cultural Resources, and paleontological resources.

## **Geology and Soils**

With Alternative 1, there would be less development, and therefore, less potential for adverse impacts associated with geologic hazards (i.e., seismic impacts) than the Project. Impacts would be less than significant under both scenarios.

## **Greenhouse Gas Emissions and Energy Consumption**

Alternative 1 would involve less overall development than the Project. Therefore, localized impacts on greenhouse gas emissions would be lower under Alternative 1 than the Project. However, the overall reduction in vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized. Impacts would be less than significant under both scenarios.

In addition, Alternative 1 would involve less overall development than the Project. Therefore, localized impacts on energy consumption would be lower under Alternative 1 than the Project. However, the overall reduction in vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized. Impacts would be less than significant under both scenarios.

## **Hazards and Hazardous Materials**

Less development compared to the Project would result in less potential exposure of people and property to hazards and hazardous materials. Therefore, impacts would be lower under Alternative 1 than the Project.

## **Hydrology and Water Quality**

Alternative 1 would involve less overall development than the Project. Therefore, localized impacts on stormwater runoff would be lower under Alternative 1 than the Project and would remain less than significant. However, the benefits of implementing Low Impact Development (LID) measures to increase infiltration and treatment of runoff, and the benefits of facilitating in-fill residential development and mixed uses in the City to reduce development sprawl into open space (thereby protecting the region's watersheds), would not be realized.

## **Land Use and Planning**

Both Alternative 1 and the Project would be consistent with the City's land use policies and objectives as well as the development standards of the Zoning Code. Under Alternative 1, development of additional housing in the Project area would be unlikely. Therefore, Alternative 1 would be less effective at meeting the goals of the City's Housing Element than the Project.

## **Mineral Resources**

There are no mineral resources in the City. Therefore, there would be no impacts under both scenarios.

## **Noise**

Alternative 1 would involve less overall development than the Project. Therefore, localized noise impacts would be lower under Alternative 1 than the Project. However, the overall reduction in vehicle trips and associated traffic noise within the City and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized.

## **Population and Housing**

Under Alternative 1, buildout would be expected to be less than or equal to the City's projected population growth under the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as opposed to under the Project that would involve the addition of 518 units or growth approximately one third greater than projected under the 2016 RTP/SCS. However, there would be less new housing to meet the community and regional need for market-rate housing. Therefore, overall, impacts on population and housing would be greater under Alternative 1 than under the Project.

## **Public Services and Recreation**

Alternative 1 would involve less overall development than the Project. Therefore, overall impacts would be lower than the Project.

## **Transportation and Circulation**

Alternative 1 would involve less overall development than the Project. Therefore, localized impacts on traffic would be lower under Alternative 1 than the Project. However, the overall reduction in vehicle trips within the City and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized. Additional public parking for METRO's Monrovia Gold Line Station would not be provided.

## **Utilities**

Alternative 1 would involve less overall development than the Project, and therefore, would result in less demand on utilities such as potable water, wastewater treatment, and solid waste disposal. Impacts would be less than significant.

## **21.2 ALTERNATIVE 2: BUILDOUT OF PROJECT AREA UNDER CURRENT ZONING**

Under Alternative 2, the Alexan Foothills Specific Plan area and ZCA Areas A and C would be built out under existing land use and zoning.

Under this alternative, exactly as under Alternative 1, the GPA, ZCA and Specific Plan would not occur. The Project area would continue with a land use designation of Manufacturing under the City's Land Use Element. This land use designation allows for light manufacturing and limited heavy manufacturing uses. Additionally, under the current zoning, the entire Project area would continue to be designated as Manufacturing where industrial uses are allowed in this zone (with some uses requiring a conditional use permit). Office and institutional uses are also allowed in this zone, with the exception of cemeteries and government buildings. Under this zoning, the only residential uses that are allowed are mobile home parks with a conditional use permit.

Under this alternative, the 9.63acre area could be built out under the current Manufacturing land use designation and zone. Under this alternative, incremental development of manufacturing, office, and residential uses could still occur within the entire Project area under the existing land use designation and zoning. The current land uses within this area include a mix of light industrial, warehouse/storage, office, single family residential, private surface parking, and two cellular towers. Development of a limited number of mobile homes could be developed in the Project area, but much less than the 518 residential units possible under the Project because they are one-story structures. Development of the area would likely primarily involve remodels or demolition and rebuild of industrial or office uses.

### **Project Objectives**

Alternative 2 would not incorporate the smart growth guiding principles or objectives of the Project directed at developing a sustainable community by increasing walkability and accessibility for bicyclists, providing a greater range of transportation and housing choices through transit oriented development and mixed-use development, and prioritizing infill and redevelopment rather than development of open space. These guiding principles and objectives help mitigate overall impacts on air quality, global climate change, and transportation and circulation within the City.

Under Alternative 2, Objective 1, to achieve a residential density of 54 units per acre in the Project area, would not be met. Other project objectives could be met under future proposals but likely not as well given the Manufacturing land use designation and zone. For example, future developments in the Manufacturing zone could still implement pedestrian and accessibility improvements, which would fulfill Objectives 3 and 4, but these kinds of improvements are more-often associated with residential and retail development. New manufacturing development also has the potential to improve the aesthetic appeal of the area, fulfilling Objective 5, though manufacturing project design typically focuses more on function than aesthetics.

Alternative 2 may not necessarily result in less overall development as the Project as well. Development of industrial or office uses of the same or greater size would still be feasible in the Project area under this alternative, especially if the property currently held by Trammell Crow Residential is sold to one owner.

## **21.2.1 Comparison of Impacts**

### **Aesthetics and Visual Resources**

Alternative 2 has the potential to involve greater, but still less than significant, impacts on aesthetics and visual resources than the Project given the potential for redevelopment of industrial or office uses in the 9.63-acre area currently proposed for the Project area. In addition, introduction of new industrial or office development in this area has the potential to become inconsistent and incompatible with the character of planned development in areas adjacent to the Project area (such as the Station Square Transit Village).

### **Agricultural and Forest Resources**

There are no agricultural or forest resource uses in the Project area. As such, there would be no impacts related to Agricultural and Forest Resources under both scenarios.

### **Air Quality**

Alternative 2 has the potential to involve greater vehicle trips and greater emissions of criteria pollutants and greenhouse gases than the Project given the potential for redevelopment of industrial or office uses in the 9.63-acre Project area.

Alternative 2 would involve less of an overall reduction in vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City and region associated with increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists.

### **Biological Resources**

Alternative 2 has an equal potential for the amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, localized impacts on biological resources would likely be similar under Alternative 2 as the Project and would remain less than significant with implementation of mitigation measures.

However, the benefits of the Project in facilitating in-fill residential development and transit oriented residential development would not be realized.

### **Cultural Resources and Tribal Cultural Resources**

There are no known archaeological resources, Tribal Cultural Resources, significant historic structures, or paleontological resources in the Project area. Given that Alternative 2 has an equal potential for the amount of development in the Project area as the Project (i.e., in terms of square footage), Alternative 2 would have a similar risk of inadvertent discovery of archaeological resources, Tribal Cultural Resources, and paleontological resources as the Project. Impacts would be less than significant with implementation of mitigation measures.

### **Geology and Soils**

Alternative 2 has an equal potential for the amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, the potential for adverse impacts associated with geologic hazards (i.e., seismic impacts) would be similar under Alternative 2 as the Project and would remain less than significant.

## **Greenhouse Gas Emissions and Energy Consumption**

Alternative 2 has the potential to involve greater vehicle trips and greater emissions of criteria pollutants and greenhouse gases, as well as greater energy consumption, than the Project given the potential for redevelopment of industrial or office uses in the 9.63- acre Project area.

In addition, the overall reduction in vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City and region associated with the Project as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses would not be realized

## **Hazards and Hazardous Materials**

Alternative 2 has the potential to involve greater impacts on hazards and hazardous materials than the Project given the potential for redevelopment of industrial or office uses in the 9.673-acre Project area as opposed to residential uses. Introduction of new industrial or office development in this area has a greater potential for use of hazardous materials. Therefore, impacts would be greater under Alternative 2 than the Project but would remain less than significant with implementation of mitigation measures.

## **Hydrology and Water Quality**

Alternative 2 has an equal potential for the amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, localized impacts on stormwater runoff would likely be similar under Alternative 2 as the Project and would remain less than significant.

However, the benefits of implementing Low Impact Development (LID) measures to increase infiltration and treatment of runoff, and the benefits of facilitating in-fill residential development, transit oriented development and mixed uses in the City would not be realized.

## **Land Use and Planning**

Both Alternative 2 and the Project would be consistent with the City's land use policies and objectives as well as the development standards of the Zoning Code. Under Alternative 2, development of additional housing in equivalent numbers to the Project would be unlikely. Therefore, Alternative 2 would be less effective at meeting the goals of the City's Housing Element than the Project. Therefore, impacts on land use and planning would be greater under Alternative 2, but would remain less than significant.

## **Mineral Resources**

There are no mineral resources in the City. Therefore, there would be no impacts under either the Project or Alternative 2.

## **Noise**

Alternative 2 has the potential to involve a greater number of vehicle trips and greater potential for use of noise-generating equipment than the Project given the potential for redevelopment of industrial or office uses in the 9.63-acre Project area. Therefore, noise impacts associated with Alternative 2 would likely be greater than the Project.

In addition, the overall reduction in vehicle trips within the City and region associated with the Project as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized. However, impacts related to development pursuant to Alternative 2 are expected to remain less than significant with implementation of mitigation measures.

### **Population and Housing**

Alternative 2 would result in less new housing to meet the community and regional need for market-rate housing. In addition, the expansion of industrial or office uses in the Project area would increase the number of jobs in the area thereby potentially increasing the demand for housing as well. Therefore, overall, impacts on population and housing would be greater under Alternative 2 than under the Project, however, impacts would remain less than significant.

### **Public Services and Recreation**

Alternative 2 has the potential for redevelopment of industrial or office uses in the 9.63-acre Project area, which would result in a lower demand on public services and recreational facilities in the City than the planned residential development under the Project. Impacts would remain less than significant. However, the benefits of the additional public spaces, including the public plazas and rooftop decks, associated with the Project would not be realized.

### **Transportation and Circulation**

Alternative 2 has the potential to involve a greater number of vehicle trips than the Project given the potential for redevelopment of industrial or office uses in the 9.63-acre Project area.

In addition, the overall reduction in vehicle trips within the City and region associated with the Project as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would not be realized.

In addition, additional public parking for METRO's Monrovia Gold Line Station would not be provided. Impacts related to development pursuant to Alternative 2, however, would remain less than significant with implementation of mitigation measures.

### **Utilities**

Alternative 2 has the potential for redevelopment of industrial or office uses in the 9.63-acre Project area, which would likely result in a higher demand on potable water, wastewater disposal and solid waste disposal, but impacts would remain less than significant.



### **21.3 ALTERNATIVE 3: REDUCED SPECIFIC PLAN**

Alternative 3 would involve the development of 400 multi-family residential units within the Alexan Foothills Specific Plan area. Under this alternative, 36 units would be subtracted from the top floor of the apartment complex to minimize the height of the buildings. The same number of multi-family units (82 units) would be allowed within ZCA Areas A and C.

Under this alternative, amenities would remain such as the bike repair shop, swimming pools, public plazas and rooftop decks. However, the parking garage would be scaled back in size commensurate with the reduction in 36 residential units, and no public parking for METRO's Monrovia Gold Line Station would be provided.

Square footages and heights of new structures in the 6.77-acre Alexan Foothills Specific Plan area would be reduced; however, they would likely continue to be multi-story buildings given the size of the property.

#### **Project Objectives**

Under a Reduced Specific Plan alternative, only the minimum project objectives would be met and several features would be reduced.

#### **21.3.1 Comparison of Impacts**

##### **Aesthetics and Visual Resources**

Impacts on aesthetics and visual resources associated with Alternative 3 would continue to be similar to impacts under the Project given the likelihood for continued construction of multi-story buildings in the Alexan Foothills Specific Plan area under Alternative 3. However, the reduced height of the buildings would improve views of the San Gabriel Mountains from some locations. Impacts would remain less than significant.

##### **Agricultural and Forest Resources**

There are no agricultural or forest resource uses in the City. As such, there would be no impacts related to Agricultural and Forest Resources under both scenarios.

##### **Air Quality**

Due to the lower number of vehicle trips and building square footages associated with Alternative 3, there would be a slight decrease in emissions of criteria pollutants compared with the Project. Impacts would remain less than significant with implementation of mitigation measures.

In addition, the benefits associated with overall reduction in the number of vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City as a whole and region, as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses, and increasing walkability and accessibility for bicyclists would be less under Alternative 3 than the Project.

## **Biological Resources**

Alternative 3 would only result in a slight reduction in the amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, localized impacts on biological resources would likely be similar under Alternative 3 as the Project and would remain less than significant with implementation of mitigation measures.

However, the benefits of the Project in providing additional housing and facilitating in-fill residential development and mixed uses in the City would be reduced.

## **Cultural Resources and Tribal Cultural Resources**

There are no known archaeological resources, Tribal Cultural Resources, significant historic structures, or paleontological resources in the Project area. Given that Alternative 3 would result in only a slight reduction in the amount of development in the Project area as the Project (i.e., in terms of square footage), Alternative 3 would have a similar risk of inadvertent discovery of archaeological resources, Tribal Cultural Resources, and paleontological resources as the Project. Impacts would be less than significant with implementation of mitigation measures.

## **Geology and Soils**

Alternative 3 would involve slightly less amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, the potential for adverse impacts associated with geologic hazards (i.e., seismic impacts) would be similar under Alternative 3 as the Project and would remain less than significant.

## **Greenhouse Gas Emissions and Energy Consumption**

Due to the lower number of vehicle trips and building square footages associated with Alternative 3, there would be a slight decrease in emissions of greenhouse gases and decrease in energy consumption compared with the Project. However, due to the relatively small decrease in vehicle trips overall, the overall magnitude of impacts in the City are anticipated to be similar to the Project and would remain less than significant. This alternative would only have a slightly lower impact than the Project.

In addition, the benefits associated with overall reduction in the number of vehicle trips and associated emissions of criteria pollutants and greenhouse gases within the City as a whole and region as a result of increasing in-fill residential development, increasing transit oriented development, increasing mixed uses would be less under Alternative 3 than the Project.

## **Hazards and Hazardous Materials**

With less housing units compared to the Project, buildout under Alternative 3 would result in a slight decrease in potential exposure of people and property to hazards and hazardous materials. However, due to the small relative changes in land uses associated with this alternative, overall impacts within the City would be similar and would remain less than significant.

## **Hydrology and Water Quality**

Alternative 3 would only result in a slight reduction in the amount of development in the Project area as the Project (i.e., in terms of square footage). Therefore, localized impacts on stormwater runoff would likely be only slightly reduced and therefore, similar under Alternative 3 as the Project. Impacts would remain less than significant.

However, the benefits of the Project in facilitating in-fill residential development and mixed uses in the City to reduce development sprawl into open space, thereby protecting the region's watersheds, would be reduced.

## **Land Use and Planning**

Both Alternative 3 and the Project would be consistent with the City's land use policies and objectives as well as the development standards of the Zoning Code. Alternative 3 would result in less housing than under the Project. Therefore, Alternative 3 would be less effective at meeting the goals of the City's Housing Element than the Project. Impacts would remain less than significant.

## **Mineral Resources**

Mineral resources would not be affected by the Project or this alternative.

## **Noise**

Due to the reduction in vehicle trips associated with Alternative 3, there would be a slight decrease in traffic and traffic noise levels in the area compared with the Project. However, due to the relatively small decrease in vehicle trips overall compared with the Project, the overall magnitude of impacts in the City is anticipated to be similar to the Project. Therefore, this alternative would only have a slight reduction in impacts on noise compared with the Project and impacts would remain less than significant with implementation of mitigation measures.

In addition, the benefits associated with the overall reduction in the number of vehicle trips and associated traffic noise within the City as a whole and region as a result of increasing in-fill residential development, increasing transit oriented development, and increasing mixed uses, would be less under Alternative 3 than the Project.

## **Population and Housing**

Alternative 3 would result in less new housing to meet the community and regional need for market-rate housing. Therefore, overall, impacts on population and housing would be greater under Alternative 3 than under the Project, but would remain less than significant.

## **Public Services and Recreation**

Alternative 3 would result in less population and housing in the City. Therefore, impacts on public services and recreational facilities in the City would be lower than under the Project and impacts would remain less than significant.

## **Transportation and Circulation**

Due to the lower number of trips and building square footages associated with Alternative 3, there would be a slight decrease in vehicle trips compared with the Project. However, due to the relatively small decrease in trips overall, the overall magnitude of impacts in the City are anticipated to be similar to the Project. This alternative would only have a slightly lower impact than the Project. Impacts would remain less than significant with implementation of mitigation measures.

In addition, the benefits associated with overall reduction in vehicle trips within the City as a whole and region as a result of increasing in-fill residential development, increasing transit oriented development, and increasing mixed uses would be less under Alternative 3 than the Project.

## Utilities

Alternative 3 would result in less population and housing, and less building square footage in the City than the Project. Therefore, Alternative 3 would result in less demand on potable water, wastewater treatment, and solid waste disposal than the Project. Impacts would be less than significant under either scenario.

## 21.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (Section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Alternative 1 would result in the least environmental impacts but would not meet any of the project objectives. Alternative 2 would likely result in equal or greater impacts to most issue areas than the Project, with the exception of public services and recreation and utilities.

Alternative 3 would involve an overall lower level of development and would meet the project objectives, but to a lesser extent than the Project. Alternative 3 would, therefore, be the environmentally superior alternative. This alternative, however, would only result in a slight reduction in building square footages, site coverage, and number of vehicle trips compared with the Project, resulting in similar impacts on most issue areas with the exception of public services and recreation and utilities where there would be clearly less impacts. In addition, under Alternative 3, less housing would occur, resulting in a greater impact on population and housing and land use and planning. Alternative 3 would be less effective at meeting the goals of the City's Housing Element. In addition, the benefits associated with an overall reduction in vehicle trips and associated emissions and noise within Monrovia and the region as a result of increasing in-fill residential development, increasing transit oriented development, and increasing mixed uses would be less under Alternative 3 than the Project. This would result in less benefits to air quality, greenhouse gas emissions, noise, and traffic under Alternative 3 compared with the Project. Alternative 3 is identified as the Environmentally Superior Alternative.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GPA	General Plan Amendment

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
ITE	Institute of Transportation Engineers
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
ZCA	Zoning Code Amendment

## **22. CEQA-MANDATED SECTIONS**

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This Chapter evaluates potential cumulative impacts, growth-inducing effects, significant unavoidable impacts, and irreversible environmental changes. Section 15128 of the CEQA Guidelines requires that the EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." This EIR evaluates all of the environmental topic areas and questions included in CEQA Guidelines Appendix G (Environmental Checklist Form). No possible significant effects of the Project were excluded from analysis in this EIR.

### **22.1 CUMULATIVE IMPACTS**

Section 15130(a) of the CEQA Guidelines requires that the EIR "discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable...." The CEQA Guidelines (Section 15355) define "cumulative impacts" as "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The analyses of quantitative cumulative impacts in this EIR are based on the "summary of projections" method, as authorized by Section 15130(b)(1)(B) of the CEQA Guidelines.

#### **22.1.1 Aesthetics and Visual Resources**

Project impacts on public views or the visual character of the area would be less than significant. Public views of the San Gabriel Mountains to the north are only from area roadways and from the METRO Gold Line and are already partially obstructed by buildings and other structures. Buildout of the Project and cumulative projects has the potential to have a significant impact on the visual character of the area. However, required development standards under the new Planned Development – Area 27 (PD – 27) zone, as well as design review of other future development in the Project vicinity required in mitigation measure MM AES-1, would help ensure that future development is designed in a manner to soften the transition between adjacent residential areas and the Project area. Mitigation measures MM AES-2 would minimize temporary impacts on the visual character of the neighborhood during construction. The Alexan Foothills Specific Plan includes landscape design objectives and measures to buffer and screen the proposed development to minimize aesthetic impacts on the adjacent residential neighborhood. Implementation of these measures would minimize impacts of the Project on the visual character of the area. Development of the cumulative projects is anticipated to be subject to similar standards. Finally, mitigation measures MM AES-3 and MM AES-4 would ensure that lighting is minimized and appropriately directed and that use of materials causing glare is avoided. Development of the cumulative projects is anticipated to be subject to similar requirements. Therefore, the Project would not result in a considerable contribution to any cumulative impacts on aesthetics and visual resources in the region.

#### **22.1.2 Air Quality**

The South Coast Air Quality Management District's (SCAQMD) 2016 Air Quality Management Plan (AQMP) (SCAQMD 2017) was designed to achieve attainment for all criteria air pollutants while still accommodating growth in the region. Projects that are consistent with the growth assumptions in the AQMP would not interfere with attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP. Growth projections in the

Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016) were used as growth projections in the AQMP. The Project would result in an increase in growth representing approximately one-third of the projected population growth in the 2016-2040 RTP/SCS for Monrovia. The Traffic Study (see Appendix J) contains a list of projects that have recently been approved or are pending approval by the City. Population growth associated with the Project as well as the cumulative list of projects would not exceed the projected population growth in the 2016-2040 RTP/SCS and therefore, the AQMP. In addition, the Project's operational emissions would not exceed any SCAQMD emissions thresholds, including Localized Significance Thresholds (LSTs), and construction emissions would be reduced below SCAQMD emissions thresholds with implementation of standard conditions SC-1 through SC-3 and mitigation measure MM AIR-1. Implementation of mitigation measure MM AIR-2 would ensure that buildout under the Project would not exacerbate health risks associated with DPM emissions, including from the I-210. Therefore, the Project's contribution to cumulative air quality impacts in the region would be less than considerable and there would be less than significant cumulative impacts on air quality.

### **22.1.3 Agricultural Resources**

There are no agricultural or forestry resources within and near Monrovia. Therefore, there would be no impacts, either from the Project or on a cumulative level.

### **22.1.4 Biological Resources**

Implementation of the Project would consist of alteration of an already-developed area that does not support a wide diversity of biological resources. Though the majority of the Project area currently encompasses residential, commercial, industrial, and other urban development, sensitive habitat along an unnamed drainage and coast live oak trees exist that could support plant and wildlife species. Impacts to these resources could result in a potentially considerable contribution to significant cumulative impacts on these resources. However, project-specific mitigation measures BIO-1 through BIO-2d and standard condition SC BIO-1 to protect biological resources required in this EIR would ensure that impacts are avoided or minimized, and that buildout would have a less than considerable contribution to cumulative impacts on biological resources in the region.

### **22.1.5 Cultural and Tribal Cultural Resources**

There are no known potential cultural resources or Tribal Cultural Resources within the Project area; the only potential impacts of the Project and cumulative projects would be inadvertent discovery of archaeological resources during construction. Mitigation measures MM CUL-1 through MM CUL-5 required by this EIR would also ensure that potentially significant impacts of the Project are avoided, and it is anticipated that cumulative projects would be subject to the same or substantially similar requirements. Therefore, the Project would not have a considerable contribution to cumulative impacts on cultural resources or Tribal Cultural Resources in the region.

### **22.1.6 Geology and Soils**

The effects of the cumulative projects on Geology and Soils are not of a nature to cause cumulatively significant effects from geologic impacts, or on soils, because such impacts are

site-specific and would only have the potential to combine with impacts of the Project if they occurred in the same location. The Project and other projects in the vicinity would be required to comply with the California Building Code, the City's goals and policies, and mitigation measure MM GEO-1 designed to protect the population from geologic hazards. In addition, mitigation measures GEO-2 through GEO-5 would help protect against inadvertent disturbance of paleontological resources. Such requirements would ensure that potentially significant impacts are avoided. Therefore, buildout of the Project would not exacerbate exposure to geologic hazards, significantly affect paleontological resources, and would not have a considerable contribution to cumulative impacts on geology and soils.

### **22.1.7 Greenhouse Gas Emissions and Energy Consumption**

Evaluation of a project's impact on global climate change is inherently a cumulative analysis. No one project will result in adverse effects due to global climate change; it is a project's contribution to global emissions that are evaluated. Project greenhouse gas (GHG) emissions would be below SCAQMD's interim emissions thresholds. In addition, the Project would be consistent with the SCAQMD's 2035 efficiency target of 3.0 MTCO<sub>2</sub>e/yr/service population (see Chapter 11). These thresholds and targets are intended to control the emissions of individual projects so that the cumulative impact of regional development on global climate change and greenhouse gas emissions are less than significant. Thus, the Project would not impede progress towards the State's GHG reduction goals.

Although implementation of the Alexan Foothills Specific Plan, the GP/ZCA, and cumulative projects may increase vehicle miles traveled (VMT) and energy and natural gas usage within the Project area, as compared to current conditions, increased density would provide for more efficient use of resources within Monrovia and ensure that the Project would not result in wasteful or inefficient use of energy resources.

Therefore, the Project would not have a considerable contribution to cumulative impacts on climate change and greenhouse gas emissions, and energy use.

### **22.1.8 Hazards and Hazardous Materials**

Risks related to hazards and hazardous materials are typically localized in nature since they tend to be related to on-site existing hazardous conditions and/or hazards caused by the project's construction or operation. There are no active hazardous waste cleanup actions within 1,000 feet of the Project area. Mitigation measure MM HAZ-1 would ensure that the Project is in compliance with CERCLA and the California Health and Safety Code, and that construction of the Project would not increase the risk of exposure to hazardous substances detected onsite. Mitigation measure MM HAZ-3 would ensure that any asbestos-containing material and lead-based paint is properly removed during demolition of existing structures. Finally, due to the site's past use for manufacturing, there is potential for inadvertent discovery of hazardous waste during building demolition and/or in the soil from ground disturbing activities associated with future buildout of ZCA Areas A and C. However, any materials discovered would be required to be removed through implementation of mitigation measures MM HAZ-2 and MM HAZ-3. It is anticipated that cumulative projects would be subject to similar requirements. Therefore, the Project would not exacerbate risks of exposure to hazardous waste. The Project would not result in a considerable contribution to cumulative impacts associated with hazardous waste in the region, and there are no additional significant cumulative impacts associated with hazards or hazardous materials in the region.



### **22.1.9 Hydrology and Water Quality**

Buildout of the Project would introduce impervious surfaces to the area and have the potential to increase pollutant loads into Monrovia waterways. This could have a significant effect offsite without implementation of mitigation measures. However, implementation of State regulations protecting water quality, the City's local water quality control standards imposed on new development and redevelopment, as well as City goals and policies that address water quality and urban runoff through standard condition SC HYD-1, would ensure that the Project's impacts when combined with the impact of the cumulative projects are minimized and less than cumulatively considerable. Therefore, buildout of the Project is not expected to have a considerable contribution to cumulative impacts on hydrology and water quality in the region.

### **22.1.10 Land Use and Planning**

The anticipated impacts of the Project in conjunction with cumulative development in the vicinity of the Project would increase residential density within an already urbanized area. Potential land use impacts require evaluation on a case-by-case basis because of the interactive effects of a specific development and its immediate environment. Implementation of the Project would result in a net increase of the City's population. However, development would be consistent with the City's development standards and General Plan goals and objectives, which are designed to guide the overall development of the City. With approval of all discretionary requests, the Project would be an allowable use that would not conflict with the land use or zoning classification for the site. The City is not acquiring additional land, increasing its sphere of influence, nor proposing major changes to its infrastructure. A key feature of the GPA, ZCA, and Alexan Foothills Specific Plan is to facilitate appropriate development efficiently and effectively in an area where roads and infrastructure already exist. All cumulative projects would be required to undergo environmental review, in accordance with the requirements of CEQA. Each related project would also be required to demonstrate consistency with all applicable planning documents governing the particular project site, including the General Plan and Zoning Ordinance. Should potential impacts be identified, appropriate mitigation would be prescribed that would likely reduce potential impacts to less than significant levels. Therefore, the Project would not result in a cumulatively considerable impact regarding land use.

### **22.1.11 Mineral Resources**

There are no mineral resources within and near Monrovia. Therefore, there would be no impacts, either from the Project or on a cumulative level.

### **22.1.12 Noise and Vibration**

Due to the localized nature of noise impacts, noise from the Project would not combine with noise from other projects; therefore, the Project would not contribute to significant cumulative noise impacts. Construction activities associated with other projects in proximity to the Project could occur at the same time as the Project. Operational noise generated by the Project would be negligible due to the ambient noise that is generated by the Interstate-210 and the METRO Gold Line. These cumulative projects would also be subject to noise standards and established thresholds pertaining to increased noise at the locations of sensitive receptors, as well as similar mitigation measures to the Project.

Mitigation measure MM NOI-1 would ensure that interior and exterior noise standards are met, and acoustical analyses performed to confirm, in areas of the Project adjacent to the Interstate-210 and METRO railroad tracks. This would ensure that new sensitive receptors in the area are not exposed to elevated ambient noise levels already in excess of State and local standards. Therefore, the Project would not have a considerable contribution to operational noise impacts in the area.

Cumulative traffic noise impacts from buildout of the Project and other development in the area were also modeled in Chapter 16. Results indicate that the Project would not result in a significant increase in traffic noise in the area, nor would the Project result in a considerable contribution to cumulative impacts on traffic noise in the area.

The EIR recommends implementation of mitigation measure MM NOI-2 (i.e., temporary noise barriers) to reduce the magnitude of potential construction noise impacts associated with buildout of the Alexan Foothills Specific Plan and ZCA Areas A and C concurrently (see Chapter 16). These measures would control construction noise levels such that ambient noise levels at sensitive receptor locations on the corner of Evergreen Avenue and Magnolia Avenue and west of Mayflower Avenue, would not increase by more than 10 dBA during construction activities. There is potential for construction of projects immediately to the east of the Project to occur at the same time (i.e., the area between Magnolia and Primrose, north of the METRO Gold Line and south of Evergreen). However, this adjacent development would replace sensitive receptors on the corner of Evergreen Avenue and Magnolia Avenue with the new development and the new development is far enough away to not affect sensitive receptors west of Mayflower Avenue. Therefore, the Project would not have a considerable contribution to construction noise impacts in the area.

### **22.1.13 Population and Housing**

Implementation of the Project would result in an increase in the population of Monrovia. However, the population increase, as a result of the proposed multi-unit residential development, is generally consistent with the projected increase in density and increase in transit oriented development anticipated in the Monrovia General Plan Land Use and Circulation Element EIR (2008). The EIR states the following: "...land designated for housing will in many places be developed at a higher density than what was typical in the past in the focus areas, thus providing housing for a greater number of people per acre and providing transit-oriented development opportunities (p. 3.8-3)." The EIR goes on to state that this growth does not qualify as a significant impact to population and housing, in part due to the growth management policies and environmental regulations established by the City, as well as the State and Federal governments. This Project is similar to the types of projects considered in the Land Use and Circulation Element. Overall, the Project would increase the population of Monrovia, but the Project would result in a less than significant increase in population even when combined with other residential projects that are being built in the City. Therefore, the Project would not have a considerable contribution to cumulative population impacts or cumulative impacts on housing in the region.

### **22.1.14 Public Services and Recreation**

Buildout of the Project would place additional incremental demands on the City's fire protection and emergency medical services, police services, schools, recreational facilities, and other public facilities (e.g., libraries). Impacts on police services and other public facilities were determined to be less than significant as the proposed growth under the Project is consistent

with assumptions in the General Plan. Therefore, the Project would not have a considerable contribution to cumulative impacts on these services. In addition, the Project would be subject to the City's Development Impact fees or in lieu fees to offset additional incremental demand for fire protection services, for additional schools, or additional recreational facilities created by new and/or more intense development through standard conditions SC PS-1 and SC PS-2, and mitigation measure MM PS-1. Therefore, the Project would not have a considerable contribution to cumulative impacts on public services and recreation in the area.

### **22.1.15 Transportation and Circulation**

The results of the Year 2035 roadway segment analysis, which accounts for the City's reasonably foreseeable development in the Project vicinity, without and with the full Project (Alexan Foothills Specific Plan and ZCA Areas A and C) show that all study area roadway segments would operate at satisfactory level of service (LOS) both without and with the Specific Plan and ZCA Areas A and C. Traffic impact fees would be required under mitigation measure MM T-1 to ensure that applicants pay their fair share of roadway intersection improvements identified in the Traffic Impact Analysis for the project as well. Therefore, the Project would not have a considerable contribution to cumulative impacts on traffic and transportation systems in the region.

### **22.1.16 Utilities and Service Systems**

Significant cumulative impacts to utility systems would occur if the utility providers were unable to provide adequate services to serve all cumulative projects. The majority of the cumulative projects are similar to the Project regarding construction and operational activities. The cumulative projects would increase the demand for utility services. However, utility service providers are given the opportunity to respond to an inquiry for information regarding potential increase in demand on their services for all cumulative projects, and development fees are assessed on a project-specific basis to mitigate for the resulting increase in demand for service. As discussed in Chapter 20, buildout of the Project would increase demand on utilities and service systems including potable water, treatment of wastewater, and solid waste disposal. However, calculations indicate that there would be suitable capacity within existing systems to service the growth anticipated under the Project taking into account the expected overall growth within the City. In addition, many goals and policies proposed under the GPA, ZCA, and Alexan Foothills Specific Plan would encourage increased recycling and conservation to reduce demand on these utilities as well. Implementation of mitigation measures MM UT-1 through MM UT-3 would also ensure that can and will serve letters are obtained for water and wastewater service for all future development and that the applicant for the Alexan Foothills Specific Plan will pay in lieu fees for minor improvements to water infrastructure in the area (new booster pump and 980 feet of pipeline). Standard condition SC UT-1 would ensure that applicants comply with the City of Monrovia's Construction and Demolition Disposal and Recycling Program as well. Therefore, buildout of the Alexan Foothills Specific Plan and ZCA Areas A and C is not expected to have a considerable contribution to cumulative impacts on utilities and service systems in the region.

## **22.2 GROWTH-INDUCING EFFECTS**

CEQA Guidelines Section 15126.2(d) requires that the EIR discuss "...the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

Implementation of the Project would result in a net increase of the population of Monrovia. The Project is an urban infill project and would not extend development or infrastructure to other sites. Development would be consistent with the City's development standards. The City is not acquiring additional land, increasing its sphere of influence, nor proposing major changes to its infrastructure. A key feature of the GPA, ZCA, and Alexan Foothills Specific Plan is to facilitate appropriate development efficiently and effectively in areas where roads and infrastructure already exist.

Population growth associated with the Project as well as the cumulative projects would not exceed the projected population growth in the 2016-2040 RTP/SCS. Only one new booster pump for the water system and replacement of 980 feet of water pipeline would be needed to support the Project and projected new development in other adjacent areas. The City would have an adequate water supply, and capacity to provide wastewater service and solid waste disposal. Therefore, no substantial, detrimental, cumulative growth-inducing effect is expected.

### **22.3 SIGNIFICANT UNAVOIDABLE IMPACTS**

CEQA Guidelines Section 15126.2(b) requires that an EIR discuss "significant environmental effects which cannot be avoided if the proposed project is implemented." No impacts have been identified in the EIR as significant and unavoidable for any of the following four reasons: (1) no potentially feasible mitigation has been identified; (2) potential mitigation has been identified but may be found by the Lead Agency to be infeasible; (3) with implementation of feasible mitigation, the impact still would not, or might not, be reduced to a less than significant level; or (4) implementation of the mitigation measure would require approval of another jurisdictional agency, whose approval will be pursued by the Lead Agency but cannot be guaranteed as of the publication of this EIR.

With implementation of mitigation measures, the Project would have no significant and unavoidable impacts.

### **22.4 IRREVERSIBLE ENVIRONMENTAL CHANGES**

CEQA Guidelines Section 15126.2(c) requires that the EIR discuss "significant irreversible environmental changes which would be caused by the proposed project should it be implemented." Since the City of Monrovia is already mostly developed and the Project would not significantly change the circulation pattern or make other major changes to backbone infrastructure facilities, there would not be any irreversible physical changes caused by the GPA, ZCA, or Alexan Foothills Specific Plan.

Implementation of the GPA, ZCA, or Alexan Foothills Specific Plan would result in an irreversible commitment of energy resources, primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline or diesel fuel for construction equipment and vehicles, as well as the use of these same resources during long-term operation of individual projects facilitated by the GPA, ZCA, or Alexan Foothills Specific Plan. However, because new development would be required by law to comply with the California Building Code and the City's energy conservation goals and policies, implementation of the Project would not be expected to use energy in a wasteful, inefficient, or unnecessary manner.

The consumption or destruction of other non-renewable or slowly renewable resources would also result during construction, occupancy, and use under the Project. These resources would

include, but would not be limited to, lumber, concrete, sand, gravel, asphalt, masonry, metals, and water. Implementation of the Project would also irreversibly use water and solid waste landfill resources. However, development under the GPA, ZCA, or Alexan Foothills Specific Plan would not involve a large commitment of those resources relative to supply, nor would it consume any of those resources wastefully, inefficiently, or unnecessarily, especially considering ongoing City conservation and recycling programs.

<b>List of Acronyms, Abbreviations, and Symbols</b>	
<b>Acronym / Abbreviation</b>	<b>Full Phrase or Description</b>
AQMP	Air Quality Management Plan
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
EIR	Environmental Impact Report
GPA	General Plan Amendment
LST	Localized Significance Threshold
MTCO <sub>2e</sub>	metric tons of carbon dioxide equivalents
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAQMD	South Coast Air Quality Management District
ZCA	Zoning Code Amendment

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