Prepared For:
City of Irwindale
5050 North Irwindale Avenue
Irwindale, CA 91706
Ms. Brandi Jones, Senior Planner

Irwindale Industrial Center Project

Initial Study

Westlake Village Office
920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Meridian Consultants

Los Angeles Office
706 S. Hill Street, 11th Floor
Los Angeles, CA 90014

SEPTEMBER 2019

Initial Study

Irwindale Industrial Center Project

PREPARED FOR:

City of Irwindale
5050 North Irwindale Avenue
Irwindale, CA 91706
Contact: Ms. Brandi Jones, Senior Planner
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SEPTEMBER 2019

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1.0 INTRODUCTION

Project Title:	Irwindale Industrial Center Project
Lead Agency Name and Address:	City of Irwindale Community Development Department 5050 North Irwindale Avenue Irwindale, California 91706
Contact Person and Telephone Number:	Brandi Jones Senior Planner City of Irwindale Community Development Department (626) 430-2260 bjones@irwindaleca.gov
Project Location:	The Project Site is located at 5010 Azusa Canyon Road in Irwindale, California and is identified by Assessor's Parcel Numbers 8417-025-800, 8417-025-801, 8417-026-800, and 8417-026-801
Project Sponsor's Name and Address:	Jason Hines FLP Irwindale LLC 19300 South Hamilton Avenue, Suite 200 Gardena, California 90248

PROJECT SUMMARY

The City of Irwindale (City) has prepared this Initial Study (IS) to evaluate the potential environmental effects of the proposed Irwindale Industrial Center Project (Proposed Project). The Project Applicant, FLP Irwindale LLC, is proposing to demolish the existing buildings and improvements on the site and develop two industrial buildings. The Project Site comprises four existing parcels (Assessor Parcel Numbers [APNs] 8417-025-800, 8417-025-801, 8417-026-800, and 8417-026-801), totaling approximately 10.7 acres, located at 5010 Azusa Canyon Road, at the northeast corner of Nubia Street and Azusa Canyon Road. The Project involves the consolidation of the four existing parcels into two parcels. The two proposed buildings would be constructed on the two new parcels. Building 1 would be an approximately 184,879-square-foot warehouse/office with 21 loading docks for trucks at the rear of the property. The building would be a contemporary design consistent with the Commercial and Industrial Design Guidelines and would be located along Azusa Canyon Road. This building would have 4,812 square feet of first floor office space, 4,497 square feet of second floor office space, and approximately 175,570 square feet of warehouse space.

Building 2 would be sited at the current southeast rear parking lot. It would be similar in design to Building 1; however, Building 2 would only be 49,105 square feet, with six loading docks for trucks. Building 2 would have 2,886 square feet of first floor office space, 2,500 square feet of second floor office space, and approximately 43,719 square feet of warehouse space.

The Project Site is currently occupied with several one- and two-story industrial buildings, with the remaining parcels used for parking. The Project Site is zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing) and is designated "Industrial/Business Park" by the City's General Plan. The Project is subject to the Irwindale Commercial and Industrial Design Guidelines.

The Project will require the following discretionary and/or administrative approvals from the City:

- Site Plan and Design Review Permit to address the site configuration, design, location, and impact of the proposed use and the compliance of the Project with the established Zoning Code standards and City of Irwindale Commercial and Industrial Design Guidelines; and
- Lot Line Adjustment to combine APNs 8417-025-800, 8417-025-801, 8417-026-800, and 8417-025-801 into two (2) lots.

ORGANIZATION OF THE INITIAL STUDY

This IS is organized into six sections as follows:

- **Section 1: Introduction** provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.
- **Section 2: Environmental Setting** describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.
- **Section 3: Project Description** provides a detailed description of the Proposed Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.
- **Section 4: Environmental Checklist** presents the checklist responses and evaluation for each resource topic.
- **Section 5: Environmental Analysis** includes an analysis for each resource topic and identifies impacts of implementing the Proposed Project. It also identifies mitigation measures, if applicable.
- **Section 6: References** identifies all printed references and individuals cited in this IS.
- **Section 7: List of Preparers** identifies the individuals who prepared this report and their areas of technical specialty.

Appendices presenting data supporting the analysis or contents of this IS include the following:

- Appendix A: Health Risk Assessment
- Appendix B: CalEEMod Worksheets
- Appendix C: The Historical Assessment
- Appendix D: Geotechnical Report
- Appendix E: Phase I and Phase II Environmental Site Assessments
- Appendix F: Hydrology Report
- Appendix G: Noise Modeling Worksheets
- Appendix H: Traffic Impact Analysis

This preliminary analysis has been prepared by and for the City of Irwindale as the Lead Agency to determine whether preparation of a Negative Declaration, Mitigated Negative Declaration (MND), or Environmental Impact Report is required to comply with the California Environmental Quality Act (CEQA). An MND is prepared for a project when potentially significant effects on the environment are identified but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record that the project, as revised, may have a significant effect on the environment.

The analysis in this IS identifies potentially significant impacts on the environment that could result from the Proposed Project but also identifies measures that would reduce these impacts to less than significant. Therefore, the analysis contained herein supports the adoption of an MND for the Proposed Project.

PUBLIC REVIEW OF THE PROPOSED MND

CEQA requires that the lead agency circulate a Proposed MND for review and comment prior to adoption. In conformance with CEQA, the City is circulating this Proposed IS and MND for a 20-day review period. The City will consider the proposed MND together with any comments received during the public review period prior to adoption of the MND.

Interested individuals, organizations, responsible agencies, and other agencies can provide written comments to:

City of Irwindale
Community Development Department
5050 North Irwindale Avenue
Irwindale, California 91706
Attn.: Brandi Jones, Senior Planner

Comments may also be sent by email to bjones@irwindaleca.gov. Please put "5010 Azusa Canyon Road - Irwindale Industrial Center" in the subject line. Agency responses should include the name of a contact person within the commenting agency.

The Draft IS is available for review at the following locations:

City of Irwindale
Community Development Department
16102 Arrow Highway
Irwindale, California 91706

City of Irwindale
City Clerk
5050 North Irwindale Avenue
Irwindale, California 91706

Irwindale Public Library
5050 North Irwindale Avenue
Irwindale, California 91706

The City's Website: http://www.ci.irwindale.ca.us/index.aspx?NID=384

2.0 ENVIRONMENTAL SETTING

PROJECT LOCATION

The Project Site is in the City of Irwindale within Los Angeles County, as shown in **Figure 2.0-1: Regional Location Map**. The City is located in the San Gabriel Valley, roughly 20 miles east of downtown Los Angeles, northeast of the City of Baldwin Park, and south of the Cities of Monrovia and Duarte.

As shown in **Figure 2.0-2: Project Vicinity Map,** the Project Site is located at 5010 Azusa Canyon Road in Irwindale, California, approximately 675 feet south of Arrow Highway, and at the northeast corner of Nubia Street and Azusa Canyon Road, which forms the border between the City of Irwindale and the City of Baldwin Park. The Project Site includes four existing parcels (APNs 8417-025-800, 8417-025-801, 8417-026-800, and 8417-026-801), totaling approximately 10.7 acres. Commercial buildings and associated parking lots are located north of the site; commercial and industrial buildings are to the east and south; and Azusa Canyon Road and a residential neighborhood in the City of Baldwin Park are west of the Project Site.

As shown in **Figure 2.0-3: Aerial View of the Project Site**, the Project Site currently contains four buildings and one structure, including an office building, fleet maintenance building, warehouse, storage area (Barn), and truck wash; the remaining parcels are used for parking. The Project Site is relatively flat and contains no landscaping. The Project Site contains two driveways, one extending from Nubia Street and the other at the northernmost limits of the Project Site, with both along Azusa Canyon Road.

REGIONAL AND LOCAL ACCESS

Regional Access

Regional access to the Project Site is provided by the Interstate 605 (I-605) freeway, located approximately 2.25 miles to the west of the Project Site; Interstate 210 (I-210) freeway, located approximately 1.75 miles north of the Project Site; and Interstate 10 (I-10) freeway, located approximately 2.25 miles south of the Project Site.

Local Access

East–west access is provided by Arrow Highway, just north of the Project Site. Direct access to the Project Site is provided from Azusa Canyon Road, a north–south street extending from Arrow Highway south to West San Bernardino Road. Other local streets near the site include Nubia Street, which borders the southern portion of the Project Site and runs in an east–west direction though the Baldwin Park residential area.

LAND USE AND ZONING DESIGNATIONS

As shown in **Figure 2.0-4: Zoning Map**, the Project Site is zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing) and is designated Industrial/Business Park by the City's General Plan. The Project is subject to the Irwindale Commercial and Industrial Design Guidelines. The Industrial designation corresponds to the C-M (Commercial Manufacturing), M-1 (Light Manufacturing), and the M-2 (Heavy Manufacturing) zones. M-2 allows for any uses permitted in M-1, C-M, C-3 (Heavy Commercial-Residential), C-2 (Heavy Commercial), C-1 (Neighborhood Commercial), and C-P (Commercial Professional) zones, as well as various manufacturing uses, including plumbing, roofing, stone, and wood product manufacturing.[1] The maximum floor–area ratio (FAR), as determined by the General Plan designation for this category is 1.0 to 1.0.

SURROUNDING LAND USES

The Project Site is bounded by commercial buildings and an associated parking lot to the north; additional commercial and industrial uses to the east and south; and Azusa Canyon Road and the residential community of Baldwin Park to the west.

Figure 2.0-3 depicts the zoning designation of the Project Site and the surrounding properties.

North: Properties located north of the Project Site include various manufacturing and warehouse facilities and a Public Storage facility, as well as Los Angeles County Fire Department Station 48. These properties are zoned M-2(Heavy Manufacturing).

East: Properties located east of the Project Site include various manufacturing and warehouse facilities. These properties are zoned M-1 (Light Manufacturing).

South: Properties located south of the Project Site include various manufacturing and warehouse facilities. These properties are zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing).

West: Properties located west of the Project Site are residential. These properties are located in the City of Baldwin Park and are zoned R-1 (Single-Family Residential).

1 City of Irwindale, *Municipal Code*, Ch. 17.56, accessed December 2018, https://library.municode.com/ca/irwindale/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.56HEMAZO_17.56.010PEUS.

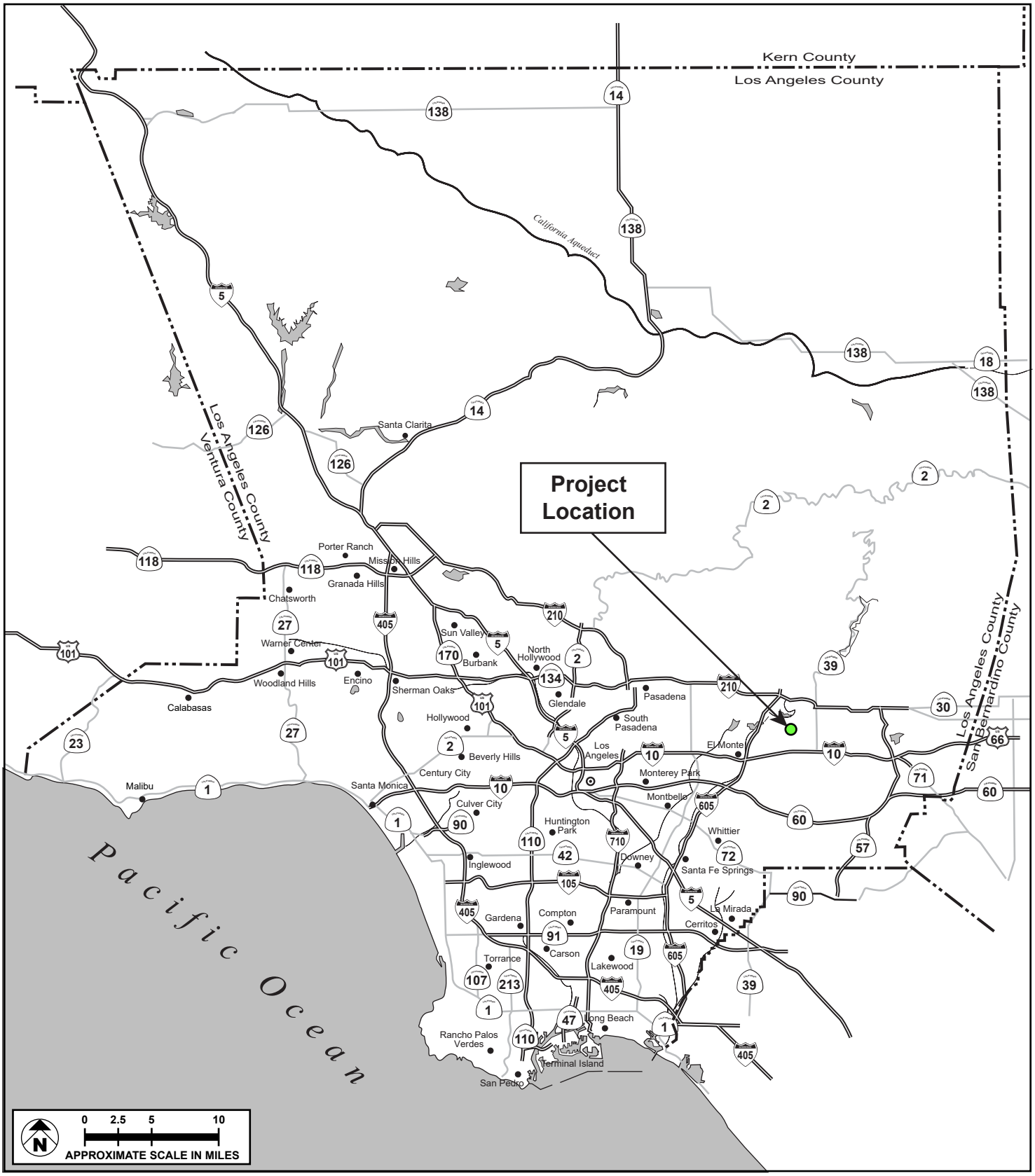
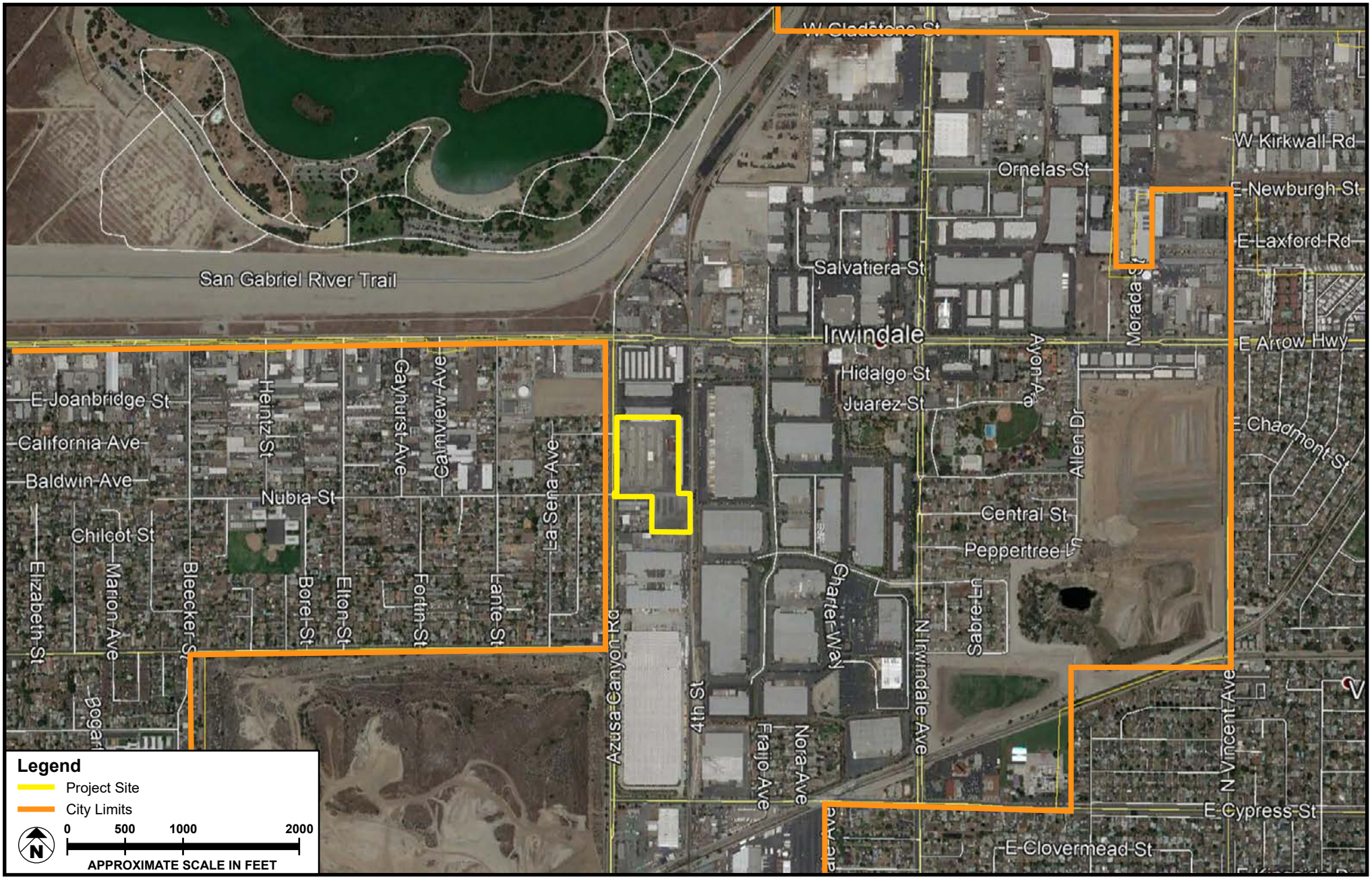


FIGURE **2.0-1**

Meridian Consultants

Regional Location Map

227-001-18



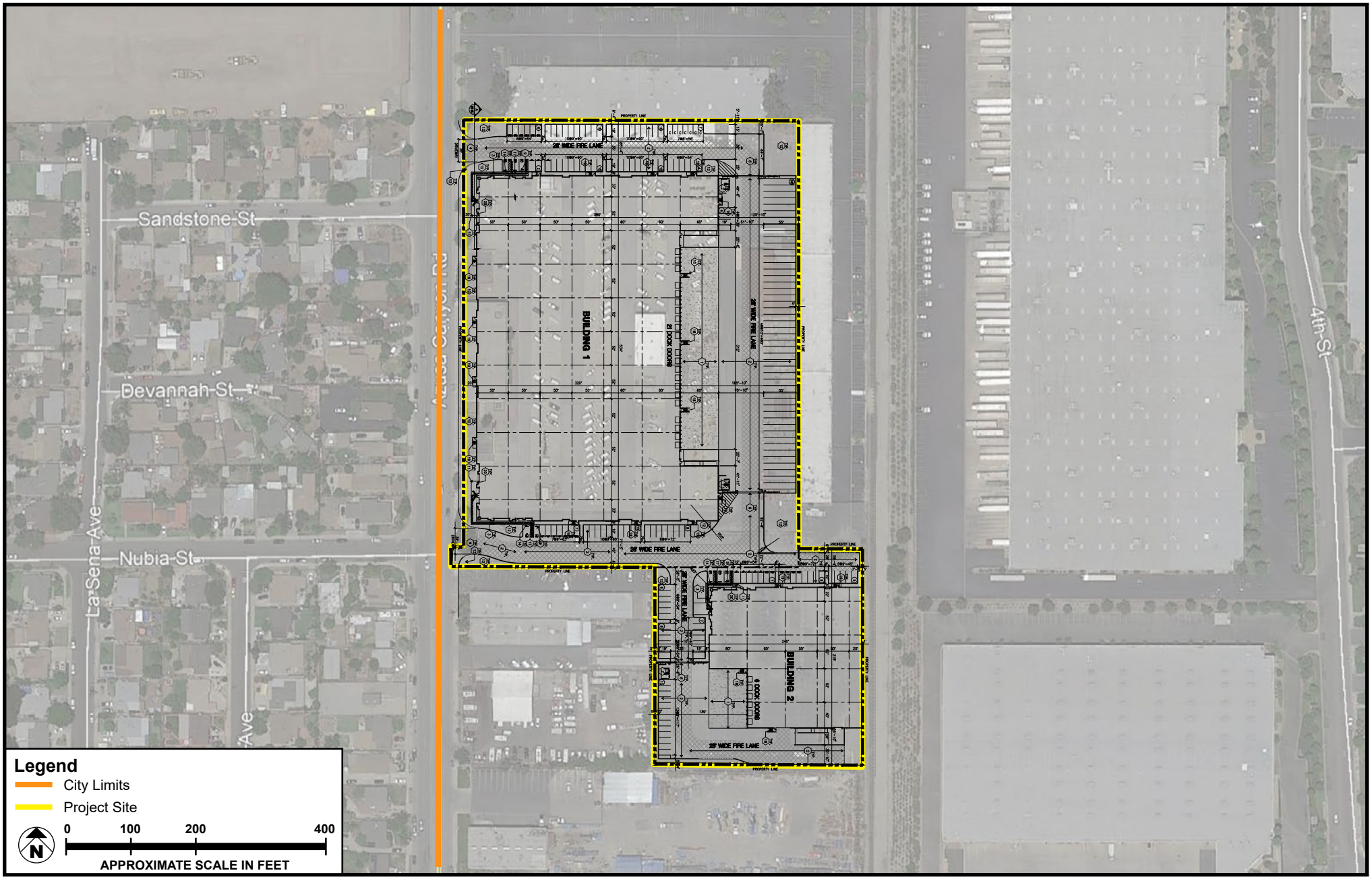
SOURCE: Google Earth - 2019

FIGURE **2.0-2**

Meridian Consultants

Project Vicinity Map

227-001-18



SOURCE: Google Earth - 2019

FIGURE **2.0-3**

Meridian Consultants

Aerial View of Project Site

227-001-18

SOURCE: City of Irwindale, Los Angeles County, SCAG - 2018

FIGURE **2.0-4**

Meridian Consultants

Zoning Map

227-001-18

3.0 PROJECT DESCRIPTION

PROPOSED PROJECT

The Project Applicant, FLP Irwindale LLC, is proposing to demolish the existing buildings and improvements on the site and develop two industrial buildings. The Project Site comprises four existing parcels (APNs 8417-025-800, 8417-025-801, 8417-026-800, and 8417-026-801), totaling approximately 10.7 acres, located at 5010 Azusa Canyon Road, at the northeast corner of Nubia Street and Azusa Canyon Road. The Project involves the consolidation of the four existing parcels into two parcels. The two proposed buildings would be constructed on the two new parcels.

The Project Site is currently occupied with several one- and two-story industrial buildings, with the remaining parcels used for parking. The Project Site is designated Industrial/Business Park by the City's General Plan and zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing) and is subject to the Irwindale Commercial and Industrial Design Guidelines.

As shown in **Figure 3.0-1: Proposed Site Plan**, two 2-story buildings with a combined total of 233,984 square feet are proposed. Building 1 would include 9,309 square feet of office space and 175,570 square feet of warehouse space; while Building 2 would include 5,386 square feet of office space and 44,105 square feet of warehouse space.

As shown in **Table 3.0-1: Project Summary**, the Project includes the construction of two buildings. Building 1 would be sited on the larger, 8.35-acre parcel along Azusa Canyon Road. As shown in **Figure 3.0-2: Proposed Building 1**, this building would be a 184,879-square-foot warehouse/office with 21 loading docks for trucks at the rear of the property. Building 1 would have 4,812 square feet of first-floor office space, 4,497 square feet of second-floor office space, and 175,570 square feet of warehouse space. A total of 91 parking stalls and 48 trailer parking stalls would be provided for Building 1.

Building 2 would be sited at the current southeast rear parking lot, on a 2.35-acre parcel. It would be similar in design to Building 1; however, it would only be 49,105 square feet, with six loading docks for trucks. Building 2 would have 2,886 square feet of first-floor office space, 2,500 square feet of second-floor office space, and 43,719 square feet of warehouse space, as shown in **Figure 3.0-3: Proposed Building 2**. A total of 48 parking stalls would be provided for Building 2.

Table 3.0-1
Project Summary

Proposed Use	Building 1	Building 2	Approximate Square Footage (sf) Total
Site Area			
Square Feet	363,656	102,160	465,816 sf
Building Area			
Office—1st Floor	4,812	2,886	7,698
Office—2nd Floor	4,497	2,500	6,997
Warehouse	175,570	43,719	219,289
Total	***184,879***	***49,105***	***233,984***
Parking Facilities			
Standard	67	35	102
Accessible parking	2	2	4
Accessible van parking	2	1	3
Compact	7	0	7
EV parking	3	3	6
EV accessible parking	1	0	1
EV accessible van parking	1	1	2
Clean air/Van pool	8	6	14
Total	***91***	***48***	***139***
Trailer parking	48	0	48

_____
Notes: EV = electric vehicle; sf = square feet.
Comparable acreage for Building 1, Building 2, and Buildings 1 and 2 combined are 8.35, 2.35, and 10.69, respectively.

The Project would involve the demolition of approximately 33,420 square feet of existing building area and the construction of approximately 233,984 square feet of new building area, as shown in **Table 3.0-2: Net New Construction Summary**.

Table 3.0-2
Net New Construction Summary

Project Component	Use	Approximate Building Area (square feet)
Existing building area	Warehouse/Office	33,420
	Total Existing	33,420
Removal/Demolition		33,420
	Total Removal/Demolition	33,420
New construction	Warehouse/Office	233,984
	Total New Construction	233,984
	Net New Construction	200,564

Source: Jason Hines, Overton Moore Properties, November 2018.

DENSITY

The Project Site is zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing), designated Industrial/Business Park by the City's General Plan, and subject to the Irwindale Commercial and Industrial Design Guidelines. The Industrial designation corresponds to the C-M (Commercial Manufacturing), M-1 (Light Manufacturing), and M-2 (Heavy Manufacturing) zones. The maximum FAR for this category is 1.0 to 1.0. The Project is consistent with the applicable FAR standard as the FAR of the Project ranges from 0.48 for Building 2 to 0.51 for Building 1.

ACCESS

Regional access to the Project Site is provided by the I-605, I-210, and I-10 freeways. As shown in **Figure 3.0-1**, vehicular access to the Project Site would be provided from two driveways along Azusa Canyon Road. The southern driveway would provide both entry and exit into the Project Site, while the northern driveway would be restricted to exit only. The northern driveway is 35 feet wide and the southern driveway is 40 feet wide. The Proposed Project will remove and reconstruct the existing project site driveways in accordance with applicable engineering standards to the satisfaction of the City of Irwindale Public Works Department. The Proposed Project would also include sidewalks and pedestrian walkways throughout the site. A total of 162 at-grade vehicle parking spaces and 48 trailer parking spaces would be provided throughout the proposed development. The Project will also require a reciprocal access agreement for the building located at the rear of the Project.

ARCHITECTURAL DESIGN

The proposed warehouse buildings would be approximately 35 feet in height.[1] The visual alignment and

1 Per the Irwindale Municipal Code 17.08.085: "'Building height means the vertical distance from the finished grade of the lot to the highest average point of the building or structure.' Project roof elevations range from 37'-4" at the ridge and 29'-6" at the lowest point of the building; the average is around 34'-9.""

subsequent placement of architectural elements, such as windows, parapets, and cornice elements, promote architectural continuity between the two (2) buildings. Façade windows would be arched, as would be roof parapets. Materials would include a mix of concrete tiles, stucco, fiber cement panels and trim. The proposed aesthetic elements and design methodologies are consistent with the goals and objectives of the Irwindale Commercial and Industrial Design Guidelines.

LANDSCAPING

Approximately 48,465 square feet of landscape area is proposed, which includes various forms of ornamental trees, shrubs, ground cover, and desert succulents. As shown in **Figure 3.0-4: Proposed Landscape Plan**, the Proposed Project would include landscaped areas along Azusa Canyon Road and Nubia Street, as well as the northern and southern parking lots.

CONSTRUCTION

Construction Schedule/Phasing

Construction of the Proposed Project would take approximately 9 months. Construction is currently anticipated to start in December 2019 and be completed by August 2020. Construction would consist of four phases: (1) demolition; (2) grading; (3) building construction; and (4) construction of site improvements, including paving. The demolition/grading/site preparation phase includes removal of the existing buildings, asphalt, and grading of the site. The grading phase involves 23,170 cubic yards of cut and 23,170 cubic yards of fill, for balanced grading onsite with no import/export of soil. The building construction phase includes construction of the buildings and the site improvement phase includes construction of the parking areas, driveways and installation of the landscaping. A breakdown of the construction phases, timelines, and anticipated equipment is provided in **Table 3.0-3: Project Construction Phasing**.

Table 3.0-3
Project Construction Phasing

Construction Phase	Approximate Duration
Demolition	2 months
Grading	1 month
Building Construction	6 months
Paving	1 month

Haul Routes

Four buildings totaling approximately 33,420 square feet will be demolished. The majority of the on-site buildings and pavement, consisting of concrete and asphalt, will be crushed and used on site as base.

Demolition materials from the site that cannot be recycled or diverted will be hauled to Azusa Land Reclamation Co. Landfill. Approximately 44 daily truck trips will be required during the peak construction period.[2] All truck staging will occur either on site or at designated off-site locations and radioed into the site to be filled. The local haul route for the Project Site will utilize Azusa Canyon Road, Arrow Highway, and N. Irwindale Avenue.

Street Closures

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on site for the duration of construction activities. Traffic-lane and right-of-way closures, if required, would be properly permitted by the City and would conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities.

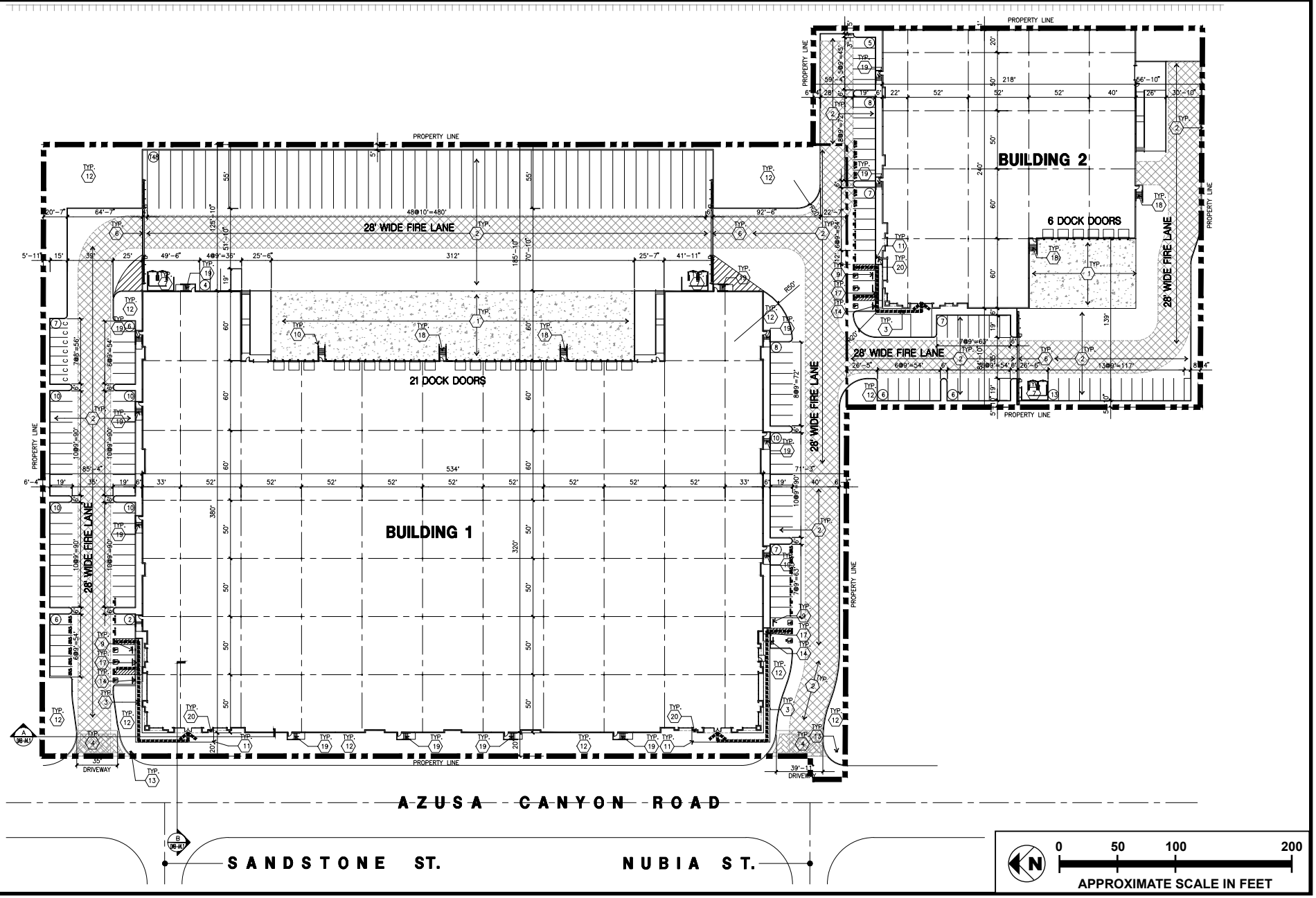
As provided in Subsections 9.28.110(A) and 9.28.110(B) of the Irwindale Municipal Code (IMC), the permissible hours of construction within the City are 7:00 AM to 7:00 PM Monday through Saturday. No construction activities are permitted on Sundays or City holidays. The Proposed Project would comply with these restrictions.

Requested Approvals

The applicant is requesting approval of the following actions:

- Site Plan and Design Review Permit to address the site configuration, design, location, and impact of the proposed use and the compliance of the Project with the established Zoning Code standards and City of Irwindale Commercial and Industrial Design Guidelines; and
- Lot Line Adjustment to combine APNs 8417-025-800, 8417-025-801, 8417-026-800, and 8417-025-801 into two (2) lots.

2 FEMA, *Debris Estimating Field Guide*, FEMA Publication No. 329, (September 2010). CY of debris ÷ dump truck capacity ÷ number of days = 10,212 CY of debris ÷ 12 CY per truck ÷ 40 working days.



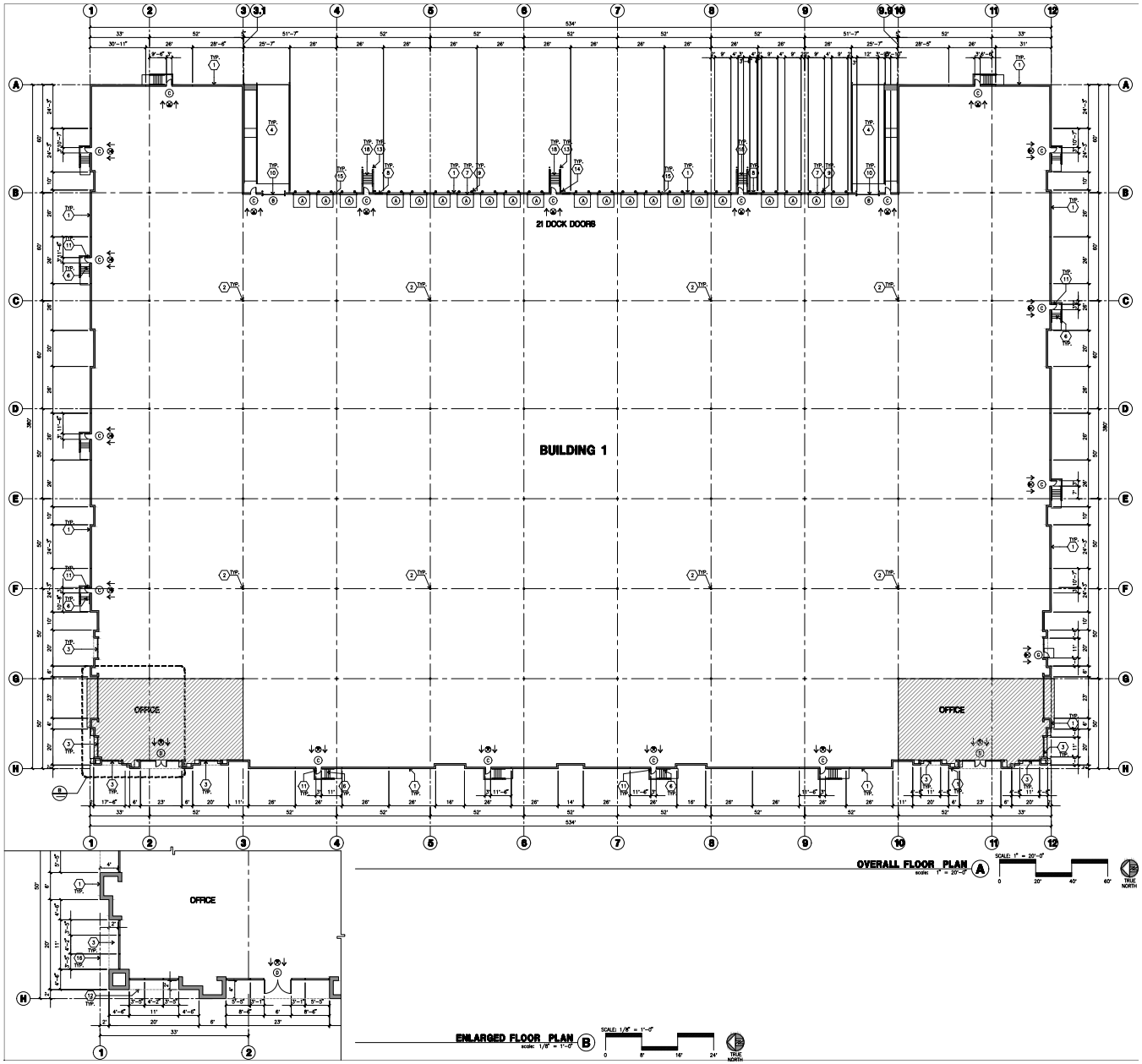
SOURCE: HPA Architecture - March 2018

FIGURE **3.0-1**

Meridian Consultants

Proposed Site Plan

227-001-18



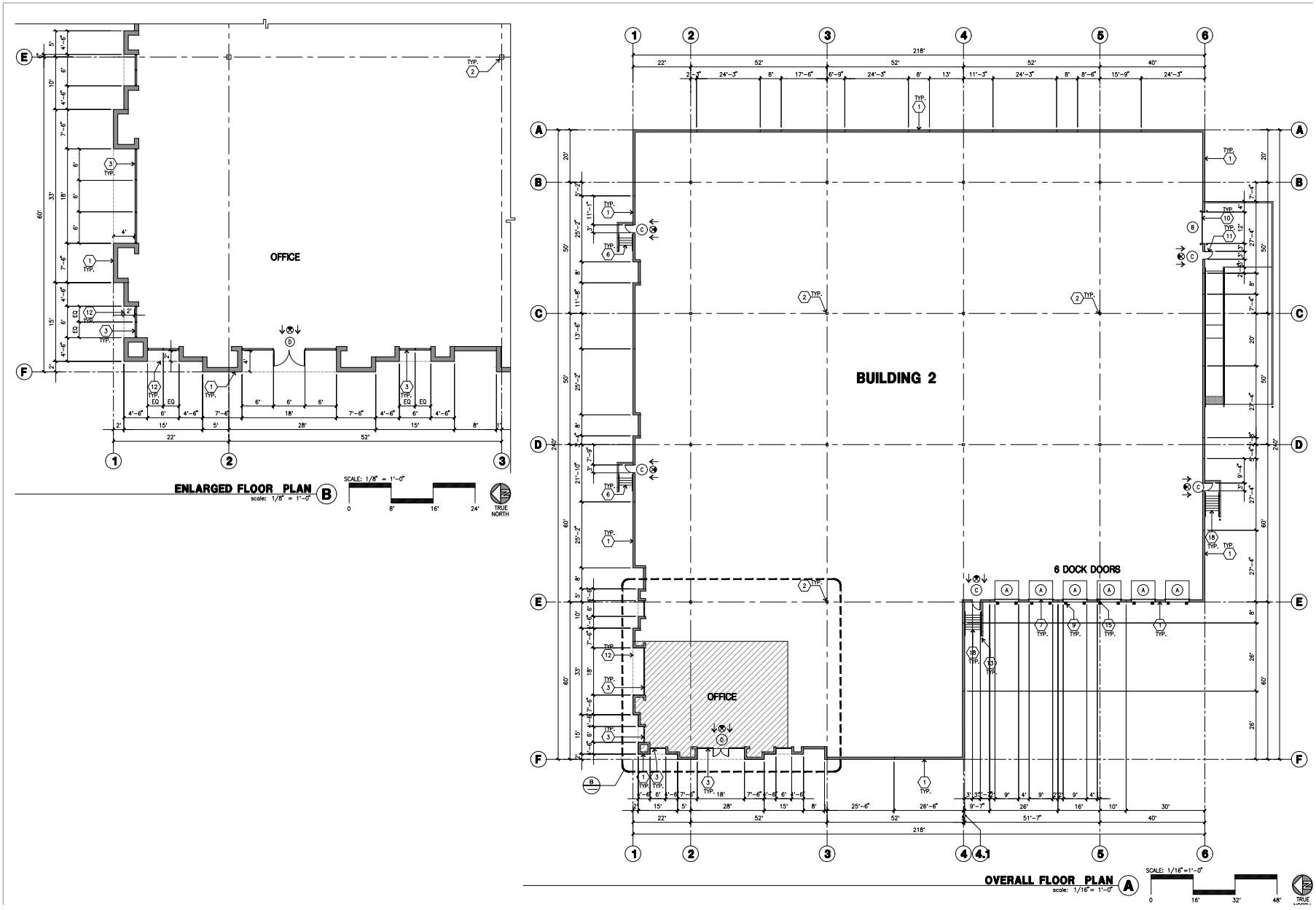
SOURCE: HPA Architecture - 2018

FIGURE **3.0-2**

Meridian Consultants

Proposed Building 1

227-001-18



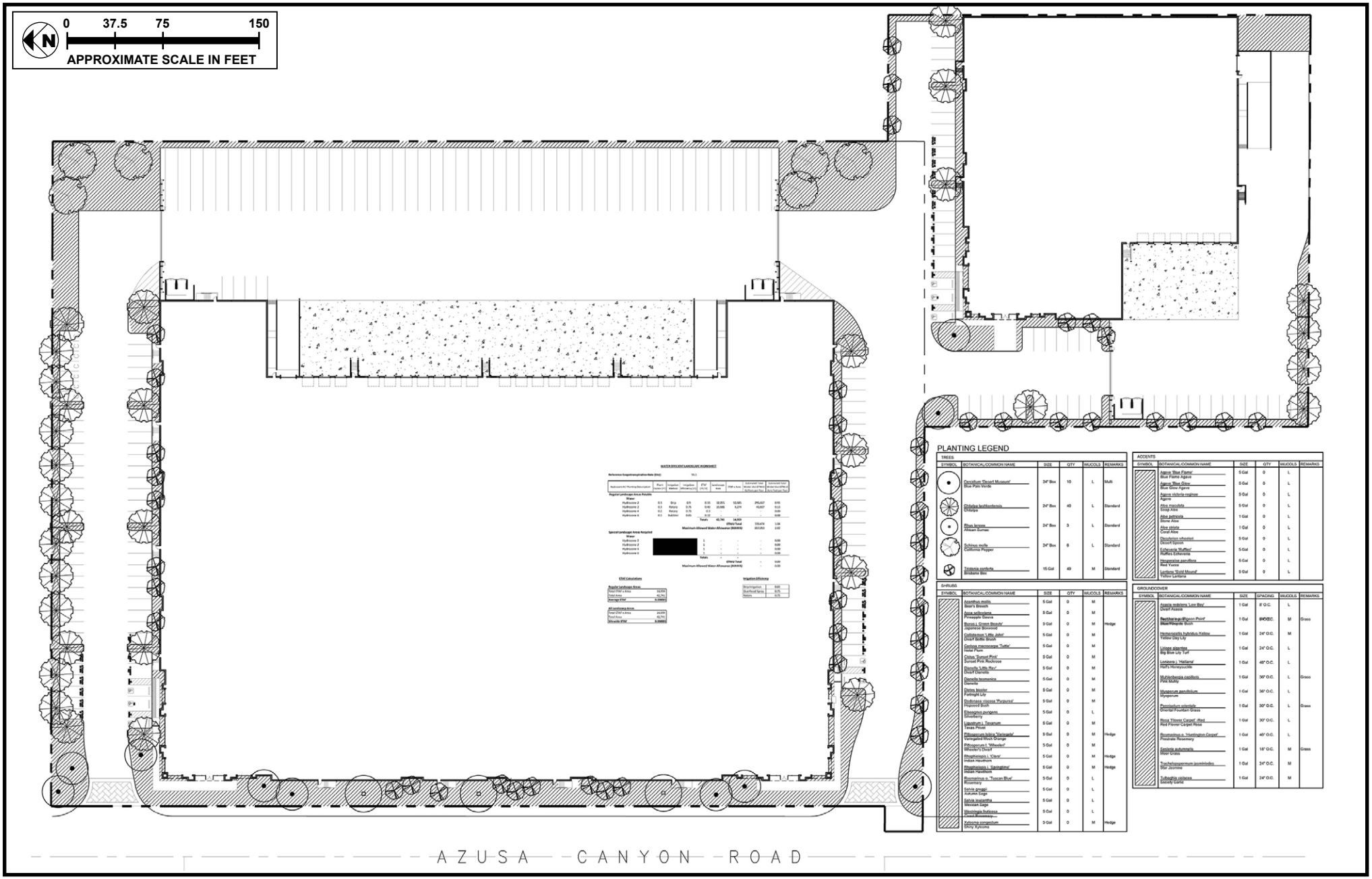
SOURCE: HPA Architecture - 2018

FIGURE **3.0-3**

Meridian Consultants

Proposed Building 2

227-001-18



SOURCE: HPA Architecture - 2018

FIGURE **3.0-4**

Meridian Consultants

Proposed Landscape Plan

227-001-18

4.0 ENVIRONMENTAL CHECKLIST

4.1 SUMMARY

Pursuant to the California Environmental Quality Act (CEQA) Guidelines,[1] an Initial Study is a preliminary environmental analysis document prepared by the lead agency to determine whether an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND) is required for a project. The State CEQA Guidelines require that an Initial Study contain a project description; a location map; a description of the environmental setting; an identification of environmental effects by checklist or other similar form; an explanation of environmental effects; a discussion of mitigation for potentially significant environmental effects; an evaluation of the Proposed Project's consistency with existing, applicable land use controls; and the names of persons who prepared the study.

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

1 California Code of Regulations, tit. 14, sec. 15063.

On the basis of this initial evaluation:

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

Signature

Date

5.0 ENVIRONMENTAL ANALYSIS

A brief explanation for the determination of significance is provided for all impact determinations except "No Impact" determinations that are adequately supported by the information sources the Lead Agency (City of Irwindale) cites in the parentheses following each question. A "No Impact" determination is adequately supported if the referenced information sources show that the impact simply does not apply to the Proposed Project (e.g., the Project falls outside a fault rupture zone). A "No Impact" determination includes an explanation of its bases relative to Project-specific factors as well as general standards (e.g., the Project would not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

Explanations take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.

Once the Lead Agency has determined that a physical impact may occur, then the checklist indicates whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant.

"Mitigated Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

Earlier analyses may be used where, pursuant to the tiering of a program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside

document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

The explanation of each issue should identify:

a) the significance criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5.1 AESTHETICS

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

a. No Impact.

The City's General Plan Update identifies the San Gabriel River as the major topographic feature in the City's planning area. The San Gabriel Fiver traverses the City in the north–south orientation with the foothills of the nearby San Gabriel Mountains located to the north. The Project Site is located within a developed business park/industrial area where existing development and landscaping limits the availability of long, broad view of the San Gabriel Mountains.

The California Department of Transportation (Caltrans) identifies one eligible scenic highway located approximately 2.3 miles away from the Project Site—the segment of California State Route (SR) 39 beginning at San Gabriel Canyon Road though the San Gabriel Mountains and Angeles National Forest, ends at the connection to SR 2.[2] This highway provide scenic views throughout the San Gabriel Mountains and Angeles National Forest and are identified as "Eligible State Scenic Highways—Not Officially Designated."[3] The Project Site located in a developed portion of the City of Irwindale surrounded by commercial buildings with associated parking lots to the north; additional commercial and industrial buildings to the east and south; and Azusa Canyon Road and to the west is an existing residential

2 California Department of Transportation (Caltrans), *California Scenic Highway Mapping System,* accessed November 2018 http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

3 Caltrans, *California Scenic Highway Mapping System*.

community in the city of Baldwin Park. The Project Site is currently occupied with multiple buildings; with the remaining parcels used for parking. Implementation of the Proposed Project would replace the existing industrial building and office building on the site with new industrial buildings and. and associated parking and vehicle circulation areas. The buildings would be an average of 35 feet in height. While existing views across the Project Site would be modified with Project development, the changes would not substantially impact available views from SR 39 or Azusa Canyon Road. Views through the Project Site are not currently provided due to on-site and surrounding development. The proposed development would be consistent in height and mass as the surrounding urban uses and would not intrude on views through the site. The Project Site is not located within or along a designated scenic corridor, and no scenic vistas or views exist from or through the site or any adjacent or nearby locations. For these reasons, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

The Project Site contains four buildings and one structure, including an office building, fleet maintenance building, warehouse, storage area (Barn), and truck wash; the remaining parcels are used for parking. The Project Site is currently paved with asphalt, and no on-site vegetation currently exists. The Project Site does not contain any scenic resources, such as native trees or rock outcroppings that could be damaged by the Proposed Project.

Further, the Historic Resources Assessment (Assessment) prepared for the Project found the Project Site ineligible under the applicable federal and state criteria for its significant historical associations.[4] Additionally, the buildings and structure on the Project Site were found ineligible under local criteria and the assessment further concluded the Project Site is ineligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and local register through survey evaluation.

The California Department of Transportation (Caltrans) identifies one eligible scenic highway located approximately 2.3 miles away from the Project Site—the segment of California SR 39 beginning at San Gabriel Canyon Road though the San Gabriel Mountains and Angeles National Forest, ends at the connection to SR 2.[5] This highway provide scenic views throughout the San Gabriel Mountains and Angeles National Forest and are identified as "Eligible State Scenic Highways—Not Officially Designated." The Proposed Project would not impact any scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway as none exist onsite. As such, no impact would occur.

4 ESA, *5010 Azusa Canyon Road Irwindale, California Historic Resource Assessment,* May 2018.

5 Caltrans, *California Scenic Highway Mapping System*.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The existing visual character of the Project Site is characterized by four buildings and one structure with the remaining portions paved and used for parking and vehicle/equipment storage. The Project Site is currently surrounded by existing commercial and industrial development on the north, east and south and a residential neighborhood to the north. Surrounding buildings range from one (1) to two (2) stories in height. Implementation of the Proposed Project would not change the visual character of the existing site. While the proposed buildings would be similar in height and massing, it would not introduce buildings that are incompatible with the surrounding area.

The Proposed Project would provide landscaping along Azusa Canyon Road and Nubia Street, as well as the northern and southern parking lots to enhance the visual character of the site. Furthermore, the Proposed Project would also be subject to the City's Commercial and Industrial Design Guidelines and would implement the design principles and specific guidelines established in that document including architectural continuity between buildings. The Proposed Project would not substantially degrade the existing visual character or quality of the Project Site, and no significant impact to the visual character of the site and the surrounding area would result. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

The Project Site currently contains numerous light fixtures on poles. There are additional sources of light associated with the existing buildings. New sources of lighting associated with the Proposed Project would include security and street lighting typical of industrial development. The increase in lighting would be incremental and would not create substantial light and glare impacts based on the location and orientation of the proposed lighting fixtures. The proposed building materials consist of nonreflective, textured surfaces and nonreflective glazed glass on the building exterior, and these materials would not create daytime glare. Potential glare impacts would be less than significant.

Lighting for Building No. 1 consists of three 27.5-foot pole mounted backlight fixtures along the northern perimeter wall of the Project Site and eighteen wall mount lighting fixtures which line the west, north, and east facing building elevations. Lighting for Building No. 2 consists of one 27.5-foot high perimeter wall mounted fixture, two exterior building wall mount fixtures along the building's southern elevation, and five exterior wall mount fixtures on the east and west building elevations.

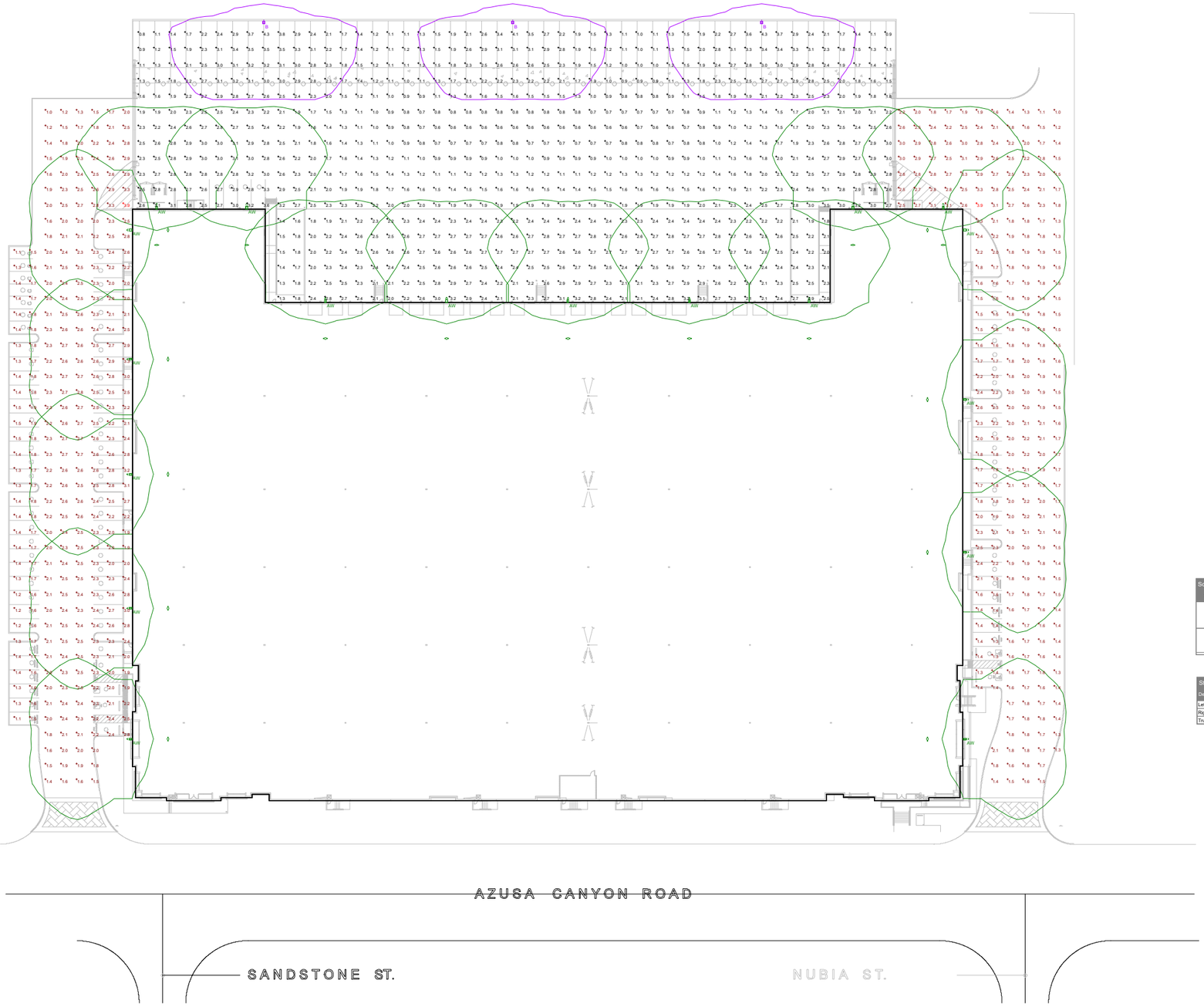
As shown in **Figure 5.1-1: Project Lighting Building 1**, the proposed lighting fixtures would introduce light throughout the site surrounding Building 1. Illumination for the left parking area of Building 1 ranges from 1.0 to 3.9 foot-candle, with an average of 2.2 foot-candle, while the right parking lot ranges from 1.0 to 3.9 foot-candle, with an average of 1.9 foot-candle. The truck area illumination ranges from 0.6 to 4.3 foot-candle, with an average of 2.0 foot-candle.

As shown in **Figure 5.1-2: Project Lighting Building 2**, the proposed lighting fixtures would introduce light throughout the site surrounding Building 2. Illumination for the front parking area of Building 2 ranges from 1.0 to 2.8 foot-candle, with an average of 1.8 foot-candle, and the truck area illumination ranges from 1.0 to 3.8 foot-candle, with an average of 2.0 foot-candle.

The Project Site will be secured with appropriate security lighting to obtain a minimum of 1-foot candles over the entire site. Further, a photometric lighting plan will be submitted, subject to the review and approval of the Community Development Department and the Police Department.

Project related security lighting fixtures will be shielded and will not project above the fascia or roof line of the buildings. The shields will be painted to match the surface to which they are attached. Security lighting fixtures will not be substituted for parking lot or walkway lighting fixtures.

Further, all Project lighting is designed to complement the structures and oriented to properly illuminate the site as not to create "dark pockets" that could support nefarious activities or spill onto other properties, creating a nuisance. For these reasons, impacts related to lighting will be less than significant. ***Mitigation Measures:*** No mitigation measures are required.



Schedule

Symbol	Label	Quantity	Manufacturer	Catalog Number	Description	Lamp	Filename	Light Loss Factor	Wattage
	B	3	Lithonia Lighting	DSX1 LED P8 40K T3M MVOLT HS overall height at 27.5ft (25ft pole + 2.5ft base)	DSX1 LED P8 40K T3M MVOLT with houseside shield	LED	DSX1_LED_P8_40K_T3M_MVOLT_HS.ies	0.92	207
	AW	18	Lithonia Lighting	DSX1 LED P8 40K TFTM MVOLT WBA wall mounted at 34ft	DSX1 LED P8 40K TFTM MVOLT	LED	DSX1_LED_P8_40K_TFTM_MVOLT.ies	0.92	207

Statistics

Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
Left Parking	+	2.2 fc	3.9 fc	1.0 fc	3.9:1	2.2:1
Right Parking	+	1.9 fc	3.9 fc	1.0 fc	3.9:1	1.9:1
Truck Area	+	2.0 fc	4.3 fc	0.6 fc	7.2:1	3.3:1

0 50 100 200

APPROXIMATE SCALE IN FEET

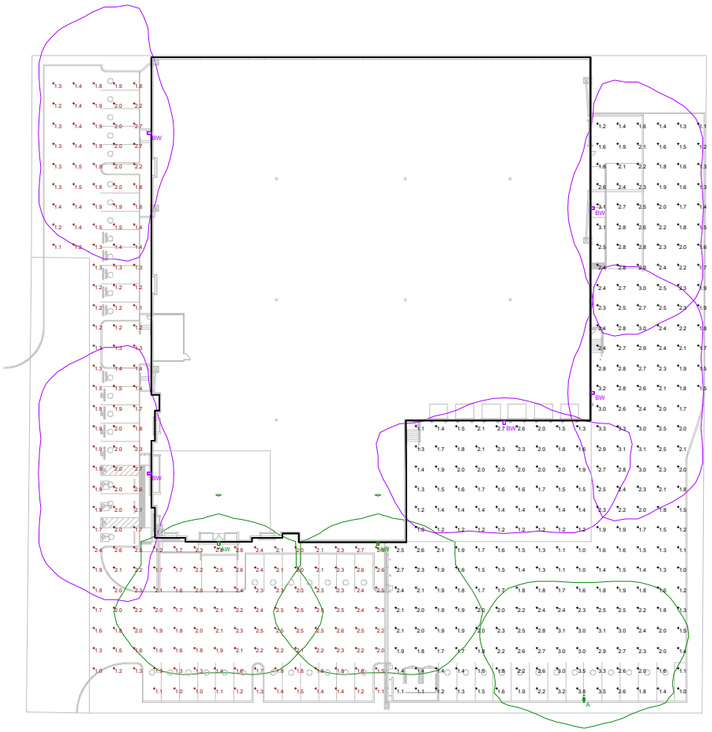
SOURCE: HPA Architecture - 2018

FIGURE **5.1-1**

Meridian Consultants

Project Lighting Building 1

227-001-18



Schedule									
Symbol	Label	Quantity	Manufacturer	Catalog Number	Description	Lamp	Filename	Light Loss Factor	Wattage
	A	1	Lithonia Lighting	DSX1 LED P8 40K TFTM MVOLT HS overall height at 27.5ft	DSX1 LED P8 40K TFTM MVOLT with houseside shield	LED	DSX1_LED_P8_40K_TFTM_MVOLT_HS.ies	0.92	207
	AW	2	Lithonia Lighting	DSX1 LED P8 40K TFTM MVOLT WBA wall mounted at 34ft	DSX1 LED P8 40K TFTM MVOLT	LED	DSX1_LED_P8_40K_TFTM_MVOLT.ies	0.92	207
	BW	5	Lithonia Lighting	DSX1 LED P8 40K T3M MVOLT WBA wall mounted at 34ft	DSX1 LED P8 40K T3M MVOLT	LED	DSX1_LED_P8_40K_T3M_MVOLT.ies	0.92	207

Statistics						
Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
Front Parking	+	1.8 fc	2.8 fc	1.0 fc	2.8:1	1.8:1
Truck Area	+	2.0 fc	3.8 fc	1.0 fc	3.8:1	2.0:1

0 50 100 200

APPROXIMATE SCALE IN FEET

SOURCE: HPA Architecture - 2018

FIGURE **5.1-2**

Meridian Consultants

Project Lighting Building 2

227-001-18

5.2 AGRICULTURE AND FORESTRY RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
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 nonagricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forestland or conversion of forestland to nonforest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature could result in conversion of Farmland, to nonagricultural use or conversion of forestland to nonforest use?	☐	☐	☐	☒

Discussion

a. No Impact.

The Project Site is not currently used for agricultural operations and is currently designated as "Urban and Built-Up Land" on the State Important Farmland Map.[6] There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the Project Site. As such, no impact would occur to farmland.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

Per the Phase I Environmental Site Assessment, the Project Site was used for agricultural purposes from sometime prior to 1928 until at least 1952. In approximately 1957, the site began use as a telecommunication maintenance yard. The Vehicle Service Building was constructed in 1957. In 1964, a large office building was located in the southwestern portion of the site. By 1966, the historical office

6 California Department of Conservation, Division of Land Resource Protection, "Los Angeles County Important Farmland 2016," accessed November 2016, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.

building was replaced with the existing Office Building, Supply Building, Larger Storage Building, and Truck Wash Tunnel. The Project Site is located in a developed area within the City. No portion of the Project Site includes any agricultural zoning designations or uses, nor are any proposed for the site. No Williamson Act contracts are in effect for the Project Site or surrounding vicinity.[7] No conflicts with existing zoning for agricultural use or Williamson Act contract would result. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

Neither the Project Site or any surrounding land is currently defined or zoned as forest, timberland, or timberland zoned Timberland Production. The land uses surrounding the Project Site include urban residential, industrial, and open space uses. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

d. No Impact.

As previously discussed, the Project Site is not located within a forest area. No forest land would be converted to nonforest use under the Proposed Project. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

As previously noted, the Project Site is not designated as either farmland or forestland and does not involve farming or forestry operations. Furthermore, there are no agriculture or forestry operations near the Project Site. As such, no such land would be converted, and no impact would occur.

Mitigation Measures: No mitigation measures are required.

7 California Department of Conservation, Division of Land Resource Protection, "Los Angeles County Williamson Act FY 2015/2016," Sheet 2 of 2, 2016.

5.3 AIR QUALITY

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a. Less than Significant Impact.

The Project Site is located within the South Coast Air Basin (Basin), which includes Orange County, and nondesert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the regional agency that provides air quality guidance with jurisdiction over the Basin, including the City. The SCAQMD 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM2.5 NAAQS for the South Coast Air Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections and the impact of existing control measures to evaluate strategies for reducing NOx emissions sufficiently to meet the upcoming ozone deadline standards.

As discussed below, localized concentrations of nitrogen dioxide (NO2), oxides of nitrogen (NOx), carbon monoxide (CO), respirable particulate matter (PM10), and fine particulate matter (PM2.5) have been estimated for the Project. Sulfur dioxide (SO2) emissions would be negligible during construction and long-term operations and thus, would not have the potential to cause or affect a violation of the SO2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in ozone formation, VOCs are classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction and operation activities and thus, the Project's PM10 and PM2.5 emissions during construction were estimated. As shown in **Table 5.3-1: Maximum Construction Emissions** below, the Project's generation of PM10 and PM2.5 emissions during construction and operation would not exceed the SCAQMD significance thresholds at the sensitive-receptor locations near the Project Site.

Additionally, the maximum potential NOx and CO daily emissions during construction and operation of the Project (refer to **Table 5.3-1**) would not exceed the SCAQMD localized significance thresholds. Therefore, the Project's construction-related localized air quality impacts would be less than significant.

Because the Project would not introduce any substantial stationary sources of emissions (e.g., industrial-type equipment associated with toxic air contaminants), CO is the preferred benchmark pollutant for assessing local area air quality impacts from postconstruction motor vehicle operations.[8]

As discussed below, the existing land uses generate 330 trips per day, including approximately 289 trips per day from cars and 41 truck trips per day. The Project would generate 1,161 daily trips including approximately 248 truck trips per day. This results in an addition of 185 truck trips per day when compared to existing conditions. The SCAQMD recommends that a health risk assessment (HRA) be conducted for substantial individual sources of diesel PM (e.g., truck stops and warehouse distribution facilities that generate more than 100 truck trips per day and has provided guidance for analyzing such types of mobile source diesel emissions.[9] As discussed in **Appendix A: Health Risk Assessment,** the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants (TACs) that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

As discussed in **Section 5.13: Population and Housing**, the Project is not expected to induce substantial growth in the City or region above the growth anticipated by the City's General Plan and the SCAG's regional growth forecasts. As such, the Project would be consistent with the projections in the AQMP, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

8 South Coast Air Quality Management District (SCAQMD), *CEQA Air Quality Handbook,* Ch. 12: Assessing Consistency with Applicable Regional Plans, 1993.

9 SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,* 2002.

b. Less than Significant Impact.

Construction Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities. NOx emissions would primarily result from the use of the construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, and prevailing weather conditions.

The Project would be required to comply with the following rules and regulations:

- **SCAQMD Rule 402 (Nuisance)**: states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **SCAQMD Rule 403 (Fugitive Dust)**: reduces the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.
- **SCAQMD Rule 1113 (Architectural Coating)**: limits the VOC content of architectural coatings.
- In accordance with Section 2485 in Title 13 of the CCR, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

The maximum daily emissions during Proposed Project construction are presented in **Table 5.3-1**.Maximum daily emissions of air pollutants that would result from construction activities would be below the construction-related regional emissions threshold and were estimated to be 6.92 pounds per day of volatile organic compounds (VOC), 54.73 pounds per day of nitrous oxides (NOx), 42.35 pounds per day of carbon monoxide (CO), 0.05 pounds per day of sulfur dioxide (SO2), 10.19 pounds per day of PM10, and 6.63 pounds per day of PM2.5. Each of these estimates is compared to the applicable SCAQMD mass daily emission thresholds for construction activities in **Table 5.3-1**. Maximum daily estimated emissions would be below the SCAQMD threshold for all modeled air pollutants. Accordingly, emissions

of air pollutants during Proposed Project construction would not violate any air quality standard or contribute substantially to an existing air quality violation. Impacts would be less than significant.

Table 5.3-1
Maximum Construction Emissions

Year	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
2019	54	85	107	<1	6	4
2020	54	84	107	<1	6	4
Maximum	54	85	107	<1	6	4
SCAQMD Threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

_____
*Source: Refer to **Appendix B** for CalEEMod worksheets.*
Abbreviations: CO = carbon monoxide; NOx, = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.

Operational Emissions

Operational emissions would be generated by both stationary and mobile sources generated by normal day-to-day activities on the Project Site after occupancy. Stationary emissions would be generated by the consumption of natural gas for space and water heating equipment. Mobile emissions would be generated by motor vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed Project were prepared utilizing CalEEMod as recommended by the SCAQMD. The results of these calculations are presented in **Table 5.3-2: Maximum Operational Emissions**. As shown in **Table 5.3-2**, the net operational emissions generated by the removal of the existing uses and the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, operational emissions associated with the Proposed Project would be less than significant based on the applicable SCAQMD thresholds.

Table 5.3-2
Maximum Operational Emissions

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
			pounds/day			
Area	5	<1	<1	0	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	3	13	39	<1	11	3
Total	8	14	40	<1	11	3
Existing	*3*	*5*	*15*	*<1*	*3*	*1*
Net Total	5	9	25	<1	8	2
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to **Appendix B** for CalEEMod worksheets.*
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides.
*Construction assumptions (equipment, schedule, etc. based on information found in **Section 3.0, Project Description.***

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

Development of the Project in conjunction with related Projects near the site would result in an increase in construction and operational emissions in an already urbanized area of the City. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Instead SCAQMD recommends that any construction-related emissions and operational emissions form individual development projects that exceed the Project-specific mass daily emissions threshold identified above also be considered cumulative considerable.[10] Individual projects that do not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impacts. The SCAQMD neither recommends quantifies analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As shown in **Table 5.3-1** and **Table 5.3-2**, all emissions associated with the Proposed Project would not exceed the SCAMQD threshold values. In addition, with implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO,

10 SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003.

NOx, PM10, and PM2.5. As such, the Project's contribution to cumulative air quality emissions in combination with related projects would not be cumulatively considerable.

The Project would not jeopardize the attainment of air quality standards in the 2016 AQMP for the South Coast Air Basin. As such, the Project would not have a cumulative considerable contribution to a potential conflict with or obstruction of the implementation of the AQMP regional reduction plans.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The nearest sensitive receptors to the Project Site are the residential homes located west of Azusa Canyon Road, immediately west of the Project Site.

The SCAQMD has developed localized significance thresholds (LSTs), based on the amount of pounds of emissions per day a project can generate, that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[11] apply to projects that are less than or equal to 5 acres in size and are only applicable to the following criteria pollutants: NOx, CO, PM10, and PM2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA). For PM10, the LSTs were derived based on requirements in SCAQMD Rule 403 and Rule 403.1—Fugitive Dust. For PM2.5, LSTs were derived based on a general ratio of PM2.5 to PM10 for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 9, which includes East San Gabriel Valley. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are residential uses directly to west of the Project Site.

The LST Methodology uses lookup tables based on site acreage to determine the significance of emissions for environmental review purposes. However, CalEEMod does not allow the user to mitigate construction emissions by directly modifying acreage disturbed. CalEEMod calculates construction emissions (off-road

11 SCAQMD, *Final Localized Significance Threshold Methodology,* June 2003; rev. October 21, 2009.

exhaust and fugitive dust) based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. Based on the input parameters during grading, four scrapers would disturb 4 acre a day, one blade would disturb 0.5 acre a day, and one loader would disturb 0.5 acre a day for a total of 5 acres disturbed per day.[12]

In addition, given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 82 feet have been used to address the potential localized air quality impacts associated with the construction-related NOx, CO, PM10, and PM2.5 emissions for each construction phase.

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. In addition, the Project would produce long-term emissions, primarily from motor vehicle associated with the Project. The Project would add up to approximately 1,161 net total trips per day.

As shown in **Table 5.3-3: Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated within the Project Site during construction and operational activities would not exceed the applicable construction LSTs for a 5-acre site in SRA 9. The closest distance used to determine the mass-rate emissions from the screening tables is 25 meters (82 feet). Localized air quality impacts from construction and operational activities to the off-site sensitive receptors would be less than significant.

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below LOS C, and for any intersection operating at LOS D or worse where the project would increase the V/C ratio by 2 percent or more. According to the traffic study,[13] the Proposed Project would worsen the LOS at Irwindale Avenue at Arrow Highway (Intersection 14) during the AM peak hour from LOS D to E and at Azusa Canyon Road at Arrow Highway (Intersection 10) during the PM peak hour from LOS E to F. However, **Mitigation Measures MM TRA-2** and **MM TRA-3** would restripe the eastbound approach to provide a third through lane at Intersection 10 and restripe the westbound approach to provide a dedicated right turn lane at Intersection 14, respectively. Implementation of these intersection improvements would improve the LOS to acceptable levels during the AM and PM peak hours.

12 SCAQMD, "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds", accessed December 2018, http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

13 Ganddini Group, Inc., *5010 Azusa Canyon Road Traffic Impact Analysis,* December 5, 2018.

Table 5.3-3
Localized Significance Threshold (LST) Worst-Case Emissions

Source	NOx	CO	PM10	PM2.5
	pounds/day			
Construction On-Site				
Total mitigated maximum emissions	11	15	1	1
LST threshold	203	1,733	14	8
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational On-Site				
Project area/energy emissions	1	1	<1	<1
Existing area/energy emissions	<1	<1	<1	<1
Net Total	1	1	<1	<1
LST threshold	203	1,733	4	2
Threshold Exceeded?	**No**	**No**	**No**	**No**

*Refer to **Appendix B** for CalEEMod worksheets.*
Note: CO = carbon monoxide; NO_X = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Given that the Proposed Project would neither worsen the LOS of any intersection below C nor increase the V/C ratio by 2 percent of more for an intersection rated D or worse, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants

Construction activities associated with the Proposed Project would be typical of other development projects in the City and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of TACs would be less than significant.

As discussed in **Appendix A,** the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions. As such, impacts associated with the release of TACs from daily truck traffic trips would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills Land uses that are more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

Potential odor sources associated with the Proposed Project may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste associated with the Proposed Project's operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The Proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.4 BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a. No Impact.

The Project Site is currently occupied by multiple buildings in an industrial area. The Project Site is relatively flat and currently contains no landscaping or vegetation. The Project Site is not located within areas containing valued wildlife habitat.[14] The Project Site is located in a developed area and does not contain any critical habitat or support 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 (CDFW) or US Fish and Wildlife Service (USFWS). As such, no impact would occur.

14 City of Irwindale, *General Plan, "*Resource Management Element," June 2008

Mitigation Measures: No mitigation measures are required.

b. No Impact.

The Project Site is currently occupied by multiple buildings in an industrial area and contains no ground vegetation. The surrounding area is developed with various urban uses. No riparian habitat or sensitive natural community is located in the surrounding area or on the Project Site. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

The Project Site is not near nor does it contain wetland habitat or a blue-line stream. Therefore, the Proposed Project would not have a substantial adverse effect on any state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.[15] As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

d. No Impact.

The Proposed Project is located within a developed area that is not conducive to wildlife movement. As such, the Proposed Project is not anticipated to impede any wildlife movement corridors. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

The Project Site is characterized by no current ground landscaping and does not contain any existing trees. The Project Site is not a valued wildlife habitat and does not contain any biological resources of significance. As such, implementation of the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

15 United States Environmental Protection Agency (USEPA), Clean Water Act Section 404, accessed November 2016.

f. No Impact.

No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan applies to this portion of the City. Consequently, implementation of the Proposed Project would not conflict with the provisions of any adopted conservation plan. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

5.5 CULTURAL RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?	☐	☒	☐	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Discussion

a. No Impact.

CEQA Guidelines Section 15064.5(b)(1) states that "substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The Project Site is currently developed with four buildings and a vehicle maintenance structure. The following section summarizes and incorporates by reference information from the Historic Resources Assessment, dated May 2018, ("Historical Assessment"), prepared by Environmental Science Associates (ESA) for the Proposed Project. The Historical Assessment is included as **Appendix C** to this Initial Study. The Project Site was historically used for agricultural purposes from 1928 until 1952. In approximately 1957, the site began use as a telecommunication maintenance yard. The Vehicle Service Building was constructed in 1957. In 1964, a large office building was located in the southwestern portion of the site. By 1966, the historical office building was replaced with the existing Office Building, Supply Building, Larger Storage Building, and Truck Wash Tunnel.[16] The historic resources assessment (assessment) prepared for the Project concluded the Project Site to be ineligible under the applicable federal and state criteria for its significant historical associations A-D and 1-4, respectively. The assessment also found the buildings and structure on the Project Site ineligible under local criteria A-H. It was further recommended the Project Site be assigned a California Historic Resource (CHR) Status Code of 6Z; noting it as ineligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and local register through survey evaluation. As such, the Proposed Project would not involve any activities that would cause a substantial adverse change to a historic resource. No impact would occur.

16 ESA, *5010 Azusa Canyon Road Irwindale, California Historic Resource Assessment,* May 2018.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant with Mitigation.

The Proposed Project area has been heavily disturbed by past development and related construction activities. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earth-moving activities associated with construction of the Proposed Project.

During construction, if subsurface artifacts are unearthed, the Applicant is required to comply with California Public Resources Code (PRC) Section 21083.2, that specifies the protocol if cultural resources are discovered during excavation, grading, or construction activities. If that process determines that any artifacts found are tribal in origin, ground disturbance activity shall cease and the City shall notify the tribes known to be affiliated with the Project area in order to initiate development of a tribal cultural resource monitoring plan. With compliance with these procedures, impacts would be less than significant.

An archaeological monitor, in consultation with interested tribes, during grading, excavation and ground disturbing activities on the site has been required through mitigation. In the event that archaeological resources are unearthed during grading and excavation activities, all earth-disturbing work would be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California PRC Section 21083.2. After the resources have been addressed appropriately, work in the area may resume.

On December 17, 2019, the City sent tribal consultation letters to the following tribes: Gabrieleno/Tongva Tribe, Gabrieleno Tongva Indians of California Tribal Council, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation and the Gabrieleno/Tongva Nation. A written response was received from the Gabrieleño Band of Mission Indians – Kizh Nation requesting a tribal consultation, which was held on March 14, 2019. No other tribes provided a response to the consultation letter. As concluded during the AB 52 Consultation process with the Gabrieleño Band of Mission Indians–Kizh Nation (refer to **Section 5.17: Tribal Cultural Resources**), the extent of tribal cultural resources on the Project Site is currently unknown. Implementation of mitigation measure **TCUL-1** would be incorporated as part of the Proposed Project to ensure impacts to potential cultural resources, including tribal cultural resources, are reduced to a less than significant level.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

TCUL-1

The Gabrieleño Band of Mission Indians–Kizh Nation tribe prepared the following mitigation measures, received April 26, 2019, that the City accepted on May 14, 2019.

Retain a Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and

Public Resources Code Sections 21083.2(b) for unique archaeological resources: Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

Unanticipated Discovery of Human Remains and Associated Funerary Objects:

Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

Resource Assessment & Continuation of Work Protocol:
Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner.

Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

Kizh- Gabrieleño Procedures for burials and funerary remains:
If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Treatment Measures:
Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as

necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Professional Standards: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

c. Less than Significant with Mitigation.

While no formal cemeteries, other places of human internment, or burial grounds or sites are known to occur within the Project area, there is always a possibility that human remains can be encountered during construction. If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that 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 human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC 5097), relating to the disposition of Native American burials will be adhered to as well as implementation of mitigation measure **TCUL-1**. As such, impacts would be less than significant.

Mitigation Measures: TCUL-1, as previously provided.

5.6 ENERGY

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a. Less than Significant Impact.

Electricity

The proposed buildings would meet the current (2016) California Green Building Standards Code (CALGreen), and for this reason, would not result in wasteful, inefficient, or unnecessary consumption of energy or be inconsistent with state plans for energy efficiency.

The availability of electricity depends on adequate general capacity of the grid and sufficient fuel supplies. SCE estimates that electricity consumption within the SCE planning area will be approximately 124,287 GWh per year by 2027, when the Project would already be fully operational.[17,18] SCE expects to have adequate electricity supply and transmission capability to meet the needs of its customers well beyond 2027.

Further, due to the nature of the Proposed Project, redevelopment / infill, a substantial increase in energy consumption is not anticipated. Additionally, operational efficiencies that reduce energy use and waste, as mandated by CALGreen building codes would be built into the two buildings. The Project would include major appliances, for example air conditioning, heating, refrigerants, etc., that are regulated by California Energy Commission requirements for energy efficiency. The Project would also be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

17 California Energy Commission, Demand Analysis Office, "California Energy Demand Updated Forecast, 2017–2027, January 2017, available at http://www.energy.ca.gov/.

18 Given that the SCE Report does not contain specific information for the Project buildout year of 2023, the next following year, 2027, was used as a conservative analysis.

Because the Proposed Project would not result in a substantially higher consumption of electricity compared to existing conditions, the Proposed Project would not require the expansion of existing facilities or the construction of new electricity-generating or transmission facilities.

Natural Gas

The 2016 California Gas Report indicates that sufficient capacity exists in the utility network to meet future demand in Southern California. The total gas supply available in 2025 is estimated to be 2,456 million cubic feet per day; SoCalGas anticipates it will have sufficient capability to meet future needs.[19]

As previously stated, a substantial increase in Project related energy consumption is not anticipated. Additionally, operational efficiencies that reduce energy use and waste, as mandated by CALGreen building codes would be built into the two buildings. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

Because the Proposed Project would not result in a substantially higher consumption of natural gas when compared to existing conditions, and SoCalGas anticipates it will have sufficient capability to meet future needs, construction and operation of the Proposed Project would not require the expansion of existing facilities or the construction of new natural gas facilities.

b. Less than Significant Impact.

The proposed buildings will meet the current (2016) California Green Building Standards Code (CALGreen), and for this reason, will not result in wasteful, inefficient, or unnecessary consumption of energy or be inconsistent with state plans for energy efficiency, and therefore no impacts in this regard.

19 California Gas and Electric Utilities, *2016 California Gas Report*.

5.7 GEOLOGY AND SOILS

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial 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?	☐	☐	☒	☐

Discussion

The following section summarizes and incorporates by reference information from the Geotechnical Investigation Report, dated February 17, 2017 (Geotechnical Report), prepared by Southern California Geotechnical for the Proposed Project.[20] The Geotechnical Report and Addendum are included as **Appendix D** to this Initial Study.

20 Southern California Geotechnical, Geotechnical Investigation, Two Proposed Warehouse Buildings, 5010 Azusa Canyon Road Irwindale, California, February 2017

a. i. No Impact.

According to the City's General Plan, the Project Site is not located within an established Alquist-Priolo Earthquake Fault Zone.[21] The City of Irwindale is located within a seismically active region located at the junction of the Transverse Ranges and Peninsular Ranges. These two physiographic provinces experience continual seismic activity associated with the lateral movement of the tectonic plates. The San Andreas Fault System, located approximately 31 miles north of the City, delineates the boundary where these two plates are joined. The closest active faults to the Project Site are the Sierra Madre Fault, located approximately 2 miles north of the Project Site; the Clamshell-Sawpit Fault, located approximately 3 miles west of the Project Site; the Whittier/Elsinore Fault, located approximately 9 miles south of the Project Site; the Northridge Fault, located approximately 29 miles west of the Project Site; and the San Andreas Fault, located approximately 31 miles north of the Project Site.[22] Based on the available geologic data, no active or potentially active faults with the potential for surface fault rupture are located directly beneath or projecting toward the Project Site. Therefore, the potential for surface rupture because of fault plane displacement at the Project Site is considered unlikely. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

ii. Less than Significant Impact.

The Project Site could be subject to strong ground shaking in the event of an earthquake originating along one of the faults listed as active or potentially active in the Southern California area. This hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects, including strong seismic ground shaking. Compliance with applicable building codes and adherence to design recommendations presented within the Geotechnical Report would minimize structural damage to buildings and ensure safety in the event of a moderate or major earthquake. As such, impacts related to strong seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Less than Significant Impact.

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense ground shaking during earthquakes. Liquefaction is generally

21 City of Irwindale, *General Plan,* "Public Safety Element," June 2008.
22 City of Irwindale, *General Plan,* "Public Safety Element," Table 6-1.

known to occur in saturated or near-saturated cohesionless soils at depths shallower than about 50 feet. Groundwater has been measured in the site vicinity at depths of approximately 250 feet below the ground surface (bgs) and flows in a southwesterly direction. was not encountered in the field exploratory borings and is believed to be at least 100 feet below grade. Therefore, liquefaction potential at the site is considered minimal, and dynamic settlement of the on-site soils is anticipated to be negligible. Impacts related to liquefaction and other seismic-related ground failure would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. No Impact.

The topography of the Project Site and the surrounding area is relatively flat and, thus, devoid of any distinctive landforms. No known landslides have occurred near the Project Site, nor is the Project Site in the path of any known or potential landslides. The Proposed Project would not introduce any slope features on the site. The risk of ground movement due to slope failure for the Project as defined is low. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The Project Site is located on relatively level ground, which would reduce the likelihood of soil erosion, However, earthmoving activities associated with proposed demolition and construction have the potential to result in soil erosion or loss of topsoil. Short-term erosion effects during the construction phase of the Proposed Project would be prevented though required implementation of a Stormwater Pollution Prevention Plan (SWPPP) though compliance with the National Pollutant Discharge Elimination System (NPDES) program and the incorporation of best management practices (BMPs) intended to reduce soil erosion. The SWPPP includes standard construction methods such as temporary detention basins to control on-site and off-site erosion.

A network of gutters and swales would be provided throughout the Project Site, along with landscaped areas. The Proposed Project would be required to comply with the City's Standard Conditions of Approval, which require that on-site grading drawings be submitted before the issuance of a building or grading permit. This submittal would ensure that adequate drainage facilities would be provided on-site to address issues associated with drainage, water quality, and soil erosion. Therefore, the loss of top soil or soil erosion will not occur after development of the Proposed Project. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The Project Site is not located within a liquefaction zone. The relatively flat topography of the Project Site precludes both stability problems and the potential for lurching, which is earth movement at right angles to a cliff or steep slope during ground shaking. As previously discussed, the potential for hazards such as landslides and liquefaction is considered low. Liquefaction may also cause lateral spreading. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. However, if lateral containment is present for those zones, then no significant risk of lateral spreading will be present. Given that the liquefaction potential at the Project Site is low, earthquake-induced lateral spreading is also not considered to be a significant seismic hazard at the site.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Proposed Project would not involve any dewatering activities that could cause ground subsidence on the Project Site. Therefore, the potential for ground collapse and other adverse effects due to subsidence to occur on the Project Site is considered low.

Further, to minimize damage due to geologic hazards, design, and construction of the Proposed Project would be required to comply with applicable building codes. Compliance with these standards, as well as adherence to the design recommendations presented within the Geotechnical Report, would minimize impacts related to exposure to hazards including landslides, lateral spreading, subsidence, liquefaction, and collapse. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

The Project Site has previously been mass graded/compacted and developed with warehouse and office buildings, as well as the associated parking areas. Expansive soils are surface deposits rich in clays that expand when wet and shrink when dried. When these soils swell, the change in volume can exert detrimental stresses on buildings and cause structural damage. As indicated in the Geotechnical Report, the soils underlying the Project Site are considered to have a low expansion potential. To minimize damage due to geologic hazards, design and construction of the Proposed Project would comply with applicable building codes and would adhere to the design recommendations presented within the Geotechnical Report. As such, impacts related to expansive soil would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

Development of the Proposed Project would not require the installation of a septic tank or alternative wastewater disposal system. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact.

The Project Site is located in the San Gabriel Valley, which is filled with sediments derived as alluvial fan deposits from the San Gabriel Mountains to the north, and as fluvial deposits transported by the San Gabriel River to the west.[23] The entire Project Site is mapped as surficial Quaternary alluvium, consisting of alluvial gravel, according to published mapping by Dibblee and Ehrenspeck.[24] The coarse-grained, younger alluvial deposits have a low paleontological resource sensitivity.

The Project Site is underlain by artificial fill soils and near surface alluvial soils.[25] The Project Site is currently occupied by four buildings, surface parking lots, and paved driveways. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. Although no paleontological resources are known to exist on site, there is a possibility that paleontological resources exist at subsurface levels and may be uncovered during excavation of the proposed basement and foundation levels. Compliance with PRC Section 21083.2 would ensure that if resources were found during construction of the Proposed Project, they would be handled according to the proper regulations. With implementation of this standard requirement, no significant impact would occur. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

23 US Geologic Survey and Association of American State Geologists, "Geological Map of the El Monte & Baldwin Park Quadrangles," National Geological Map Database, https://ngmdb.usgs.gov/Prodesc/proddesc_71698.htm, accessed November 2018.

24 US Geologic Survey and Association of American State Geologists, "Geological Map of the El Monte & Baldwin Park Quadrangles."

25 Southern California Geotechnical, *Geotechnical Investigation, Two Proposed Warehouse Buildings, 5010 Azusa Canyon Road Irwindale, California,* February 2017.

5.8 GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a. Less than Significant Impact.

The Proposed Project would result in short-term emissions of GHGs during construction. Although GHGs are generated during construction and are accordingly considered one-time emissions, consideration of construction-related GHG emissions allows for evaluation of all the long-term GHG emissions associated with a project. Therefore, current practice is to annualize construction-related GHG emissions over a project's lifetime to include these emissions as part of a project's total emissions. A project's lifetime has generally been defined as 30 years. In accordance with this methodology, the estimated Proposed Project's construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions.

Operational emissions would be generated by both area and mobile sources because of normal day-to-day activities. Area source emissions would be generated by the consumption of natural gas for space and water heating devices. Area source emissions are based on emission factors contained in the CalEEMod model. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The Proposed Project would also result in indirect GHG emissions due to electricity demand, water consumption, and waste generation. The emission factor for CO2 due to electrical demand from Southern California Edison was selected in the CalEEMod model. Electricity consumption was based on default data found in CalEEMod for the respective land use types.

SCAQMD has not adopted recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of development projects. Thus, SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with staff on developing significance thresholds

related to GHGs. To determine significance for Projects, SCAQMD has proposed a screening threshold of 3,000 MTCO2e per year.[26]

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. As shown in **Table 5.8-1: Estimated Operational Greenhouse Gas Emissions**, area emissions contribute to less than 1 metric ton of carbon dioxide equivalent (MTCO2e) per year, less than 1 percent of the Project total emissions.

Table 5.8-1
Estimated Operational Greenhouse Gas Emissions

Source	Annual Emissions (MTCO2e)
Construction (amortized 30-year)	32
Area	<1
Energy	1,058
Mobile	1,709
Waste	146
Water	239
Project Total	3,184
Existing	1,483
Net Total	**1,701**

*Source: Refer to **Appendix B** for CalEEMod output sheets.*
Note: MTCO2e = metric tons of carbon dioxide equivalent.

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of energy usage by applicable emissions factors chosen by the utility company. As shown in **Table 5.8-1**, GHG emissions from electricity and natural gas usage would result in a total of approximately 1,058 MTCO2e per year, accounting for 33 percent of the Project total emissions.

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with employees, visitors, and delivery trucks visiting the Project Site based on the number of daily trips generated and vehicle miles travelled (VMT). Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates provided by the traffic study. As shown in **Table**

26 SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*, December 2008, accessed January 2019, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

5.8-1, GHG emissions from mobile sources would result in a total of 1,709 MTCO2e per year, accounting for 54 percent of the Project total emissions.

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emission factors provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors.[27] As shown in **Table 5.8-1**, GHG emissions from solid waste would result in a total of approximately 146 MTCO2e per year, accounting for 5 percent of the Project total emissions.

GHG emissions are related to the energy used to convey, treat, distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor. As shown in **Table 5.8-1**, GHG emissions from water/wastewater usage would result in a total of 239 MTCO2e per year, accounting for 8 percent of the Project total emissions. This includes a 20 percent reduction in water/wastewater emissions consistent with building code requirements.

As shown above, the annual net GHG emissions associated with the construction and operation of the Proposed Project would be below the SCAQMD's proposed interim threshold of significance for all land use projects of 3,000 MTCO2e per year. As such, impacts would be less than significant.

Cumulative

According to CAPCOA, GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. As discussed above, the Project would generate GHG emissions that would be less than significant. In addition, as discussed previously, the Project would be consistent with State applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions and would result in less than significant impacts regarding GHG reduction plans, policies, and regulations. Thus, as GHG impacts are exclusively cumulative in nature, cumulative impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

27 USEPA, *AP-42, Compilation of Air Pollutant Emission Factors*, accessed December 2018, https://www3.epa.gov/ttn/chief/ap42/ch02/index.html.

b. Less than Significant Impact.

The goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. On September 8, 2016, Governor Brown enacted Senate Bill (SB) 32 that extends AB 32 another ten years to 2030 and increase the State's objectives. SB 32 calls on Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In addition, AB 197 requires CARB to approve a statewide GHG emissions limit equivalent to the statewide GHG emission level in 1990 to be achieved by 2030. SB 32 requires ARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

Each source category of GHG emission mentioned above from the Project is subject to a number of regulations that indirectly reduce climate change-related emissions, including those listed below. These and other reductions from statewide initiatives are reflected in the Project's estimated GHG emissions.

- Stationary and area sources: Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap-and-Trade Program.
- Transportation: Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap-and-Trade Program.
- Energy: Both construction and operational activities from the Project Site would general energy-related emissions that are covered by the state's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers are from renewable energy sources by December 31, 2030.
- Building structures: Operational efficiencies would be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.
- Water and wastewater use: The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances: The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management: The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

The Project would comply with the mandatory compliance measures related to stationary and area sources, transportation, energy, water and wastewater, and solid waste. These measures and features are consistent with existing recommendations to reduce GHG emissions consistent with the goals of AB 32. Therefore, the Proposed Project would result in less than significant impacts and is considered consistent with applicable plans.

Mitigation Measures: No mitigation measures are required.

5.9 HAZARDS AND HAZARDOUS MATERIALS

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

Discussion

The following section summarizes and incorporates by reference information from the Phase I Environmental Site Assessment Report, dated April 18, 2017 (Phase I ESA), prepared by Ardent Environmental Group, Inc. for the Proposed Project. The Phase I ESA is included as **Appendix E** to this Initial Study.

a. Less than Significant Impact.

The Proposed Project involves the demolition of existing on-site buildings and structures, and the development of two stand-alone concrete tilt-up buildings and associated parking. Based on the Phase I ESA, no evidence of or conditions indicative of releases or threatened releases of hazardous substances on, at, or to the site has been revealed, except for the following: former and current hydraulic lifts in the

Vehicle Service Building, features associated with the Truck Wash Tunnel, three underground hydraulic oil reservoirs, the former steam cleaning area and two former clarifiers in the Vehicle Service Building, dry wells, Large Storage Buildings and the VOC-impacted groundwater. However, it was concluded in the subsurface investigation report prepared for the Project, that based on laboratory results, there is a low likelihood that elevated concentrations of petroleum hydrocarbons, VOCs, and PCBs are present in soil in the vicinity of these facilities and no further investigations or remediation are warranted at this time.

Potentially hazardous materials such as fuel, paint products, lubricants, solvents, and cleaning products may be used and/or stored on site during the construction of the proposed manufacturing facilities. The transport, use, and storage of hazardous materials during the construction of the site would be required to be conducted in accordance with all applicable State and Federal laws. No specific users have been identified for the occupancy of the future buildings at this time; therefore, the range of products and materials that would be shipped to, stored within, and transported from the Project Site is not currently known. Compliance with all applicable Federal, State, and local laws and regulations would reduce the potential impact associated with the routine transport, use, storage, or disposal of hazardous materials to a less

The limited use of various pesticides and fertilizers may also be used for landscape maintenance. These materials would be used and stored on the Project Site in accordance with applicable federal, State, and local regulations. These materials would be used and stored on the Project Site in accordance with applicable federal, State, and local regulations. Additionally, the County of Los Angeles Fire Department has the authority to perform inspections and enforce state and federal laws governing the storage, use transport, and disposal of hazardous materials and wastes. The Proposed Project would not create a significant hazard to the public or the environment. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The Project Site is currently developed with four buildings and a vehicle maintenance structure. The Project Site was used for agricultural purposes from 1928 until 1952. In approximately 1957, the site began use as a telecommunication maintenance yard. By 1966, the historical office building was replaced with the existing buildings. Additionally, since the Project Site is not located within proximity to active or abandoned oil wells or landfills, the potential for methane is considered low. Given the Project Site was historically used for agricultural purposes, there may be potential to encounter agricultural chemicals such as pesticides, herbicides, and fertilizers. However, the Phase I ESA concluded that there are no recognized environmental conditions (RECs), historic recognized environmental conditions (HRECs), or controlled

recognized environmental conditions (CRECs) connected to the Project Site. Based on the age of the buildings (1957, 1964, and 1966), asbestos containing building materials (ACMs) and lead-based paint (LBP) may be present. However, ACMs and LBP are not considered a REC in accordance with ASTM Standards. Prior to demolition, any structures potentially containing asbestos or LBP should be inspected. If ACMs and/or LBP is found, removal should be implemented under DTSC standards.

Furthermore, hazardous material impacts typically occur in a local or site–specific context. Although other foreseeable developments within the area will likely increase the potential to disturb existing contamination, the handling of hazardous materials would be required to adhere to applicable federal, State, and local requirements that regulate work and public safety. Therefore, impacts of the Proposed Project would not have the potential to create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

The closest school the Project Site is Penny Lane Nursing School, located at, 15480 Arrow Highway, Baldwin Park, approximately 0.18 miles north of the Project Site. Construction activities of the Proposed Project may involve the use of hazardous materials. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term or one time in nature and would cease upon Project completion. Additionally, these potentially hazardous materials would be used and stored in accordance with applicable federal, state, and local regulations to not pose a hazard to those students on the Project Site. All spills or leakages of petroleum products during construction activities would be required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations regarding the cleanup and disposal of the contaminant released. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Strict adherence to all emergency response plan requirements set forth by the City and LACoFD would also be required through the duration of the Project construction.

As previously discussed, the demolition of the on-site structures may result in the potential exposure to release ACMs and lead-based paint on the Project Site. However, the handling and disposal of any ACMs or lead-based paint would be required to comply with applicable state and local requirements. As discussed in **Section 5.3: Air Quality,** construction of the proposed Project would release small quantities of toxic air contaminants for a short period of time; however, the magnitude of these emissions is not

sufficient to create substantial concentrations of hazardous pollutants and the emissions are below applicable SCAQMD thresholds.

As previously stated, no specific users have been identified for the occupancy of the future buildings at this time; therefore, the range of products and materials that would be handled at the Project Site is not currently known. Compliance with all applicable Federal, State, and local laws and regulations would reduce the potential impact associated with the handling of hazardous or acutely hazardous materials, substances, or waste near schools. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

As noted earlier, a Phase I ESA was conducted for the Project Site by Ardent Environmental Group, Inc. in April 2017. The Phase I ESA was conducted in general accordance with ASTM Standard Practice E 1527-13 and the United States Environmental Protection Agency (USEPA) All Appropriate Inquiries Standard. The Phase I ESA did not identify any relevant regarding the presence of underground storage tanks (USTs) or monitoring wells on the Project Site. The Project Site is not included on a list of hazardous materials sites. The Phase I ESA concluded that there are no recognized RECs, HRECs, CRECs connected to the Project Site. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

The closest airport to the Project Site is the El Monte Airport, which is located approximately 5.35 miles to the southeast of the Project Site. The Proposed Project would not be located within an airport land use plan or within 2 miles of a public airport or public use airport. As such, there would be no safety hazards or conflicts with the existing operations of the El Monte Airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact.

The Proposed Project will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided.

Construction of the Project may require temporary and/or partial street closures on Azusa Canyon Road due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. However, the construction contractor would be required to notify the City of Irwindale Police Department, the City of Baldwin Park Police Department and the LACoFD if construction activities would impede movement for first emergency response vehicles. The Project Applicant would also be required to develop an emergency response plan in consultation with the LACoFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Implementation of these requirements would be incorporated as a typical condition of approval. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. No Impact.

The Project area is not located in a designated wildland area that may contain substantial forest fire risks or hazards. In addition, the City does not identify the Project Site to be located within a City-designated Fire Hazard Area.[28] The Proposed Project would not result in impacts related to exposing people or structures to adverse effects from wildfires. No impact would occur.

Mitigation Measures: No mitigation measures are required.

28 CalFire, Wildland Hazard & Building Codes, Los Angeles County FHSZ Map, accessed November 2018, http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles.

5.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface 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 site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a. Less than Significant Impact.

A report, *Preliminary Hydrology Calculations* (Hydrology Report), was prepared by Thienes Engineering on April 6, 2018, and is included as **Appendix F** of this Initial Study. Implementation of the Proposed Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which could result in the generation of water quality pollutants such as silt, debris, chemical, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Proposed Project in the

absence of any protective or avoidance measures. Additionally, runoff under post development conditions could contain pollutants in the absence of protective or avoidance measures. However, the Proposed Project includes landscape features

Grading activities associated with construction may temporarily increase the amount of suspended solids from surface flows derived from the Project Site during a concurrent storm event due to sheet erosion of exposed soil. In addition, during excavation and grading, contaminated soils may be exposed and/or disturbed; this could impact surface water quality through contact during storm events. The Project Applicant would be required to satisfy all applicable requirements of Section 13.5 of the City's Municipal Code, at the time of construction to the satisfaction of the City. These requirements include preparation of a Stormwater Pollution Prevention Plan (SWPPP) containing structural treatment and source control measures appropriate and applicable to the Proposed Project. The SWPPP would incorporate best management practices (BMPs) by requiring controls of pollutant discharges to reduce pollutants. Examples of BMPs that may be implemented during site grading and construction of the Proposed Project could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences. Preparation of the SWPPP would be incorporated as a condition of approval. Implementation of BMPs would ensure that Santa Ana Regional Water Quality Control Board (RWQCB) water quality standards are met during construction activities of the Proposed Project. Therefore, no significant impact during construction would occur.

After construction, the Proposed Project would increase the intensity of activities on the site and would likely result in an increase in typical urban pollutants generated by motor vehicle use on roadways adjacent to the Project Site, and the maintenance and operation of landscaped areas. Stormwater quality is generally affected by the length of time since the last rainfall, rainfall intensity, urban uses of the area and quantity of transported sediment. Typical urban water quality pollutants usually result from motor vehicle operations; oil and grease residues; fertilizer/pesticide uses; human/animal littering; careless material storage; and poor handling and property management. The majority of pollutant loads are usually washed away during the first flush of the storm occurring after the dry-season period. The Proposed Project would incorporate design features, such as landscaping and on-site bioretention basins which would satisfy the performance standards identified in Section 15.54.160 of the City's Municipal Code.

Urban pollutants have the potential to degrade water quality. However, the quality of runoff from the Project Site would be subject to Section 401 of the CWA under the National Pollutant Discharge Elimination System (NPDES). The RWQCB issues NPDES permits to regulate waste discharged to "waters of the nation," which includes reservoirs, lakes, and their tributary waters. Waste discharges include discharges of stormwater and construction surface water runoff from a project. The Project Applicant would pay applicable NPDES program fees in accordance with Section 13.54.300 of the City's Municipal Code. The Proposed Project will be required to prepare a Water Quality Management Plan (WQMP) and then

implement all appropriate BMPs described within the WQMP. Therefore, impacts related to surface or ground water quality and stormwater discharge would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The Project Site is located within the San Gabriel Valley Groundwater Basin, which is located in eastern Los Angeles County and includes the water-bearing sediments underlying most of the San Gabriel Valley and a portion of the upper Santa Ana Valley that lies in the Country. Recharge of the San Gabriel Valley Groundwater Basin is mainly from direct percolation of precipitation and percolation of stream flow. Stream flow is a combination of runoff from the surrounding mountains, imported water conveyed in the San Gabriel River channel to spreading grounds in the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin, and treated sewage effluent. The Proposed Project would not increase the amount of impervious area on the Project Site, and as such, would not reduce the amount of area available for groundwater recharge. The majority of surface runoff from the Project Site is currently collected by the municipal storm drain system and does not percolate to the groundwater basin below the Project Site. Where the surface of the Project Site is permeable, surface water flows may percolate to the San Gabriel Valley Groundwater Basin below the Project Site. Groundwater has been measured in the site vicinity at depths of approximately 250 feet bgs and flows in a southwesterly direction.[29]

The Project Site is currently occupied by multiple buildings and contains no vegetation. Implementation of the Proposed Project would decrease the level of impervious surfaces through features such as landscaping and is designed to convey stormwater runoff on site or to surrounding storm drains. The Project area is not a significant source of groundwater for public water supplies. Though stormwater does percolate into the ground under existing conditions, the proposed changes would allow for an incremental increase in groundwater recharge with the increase in permeable surfaces. Therefore, the Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. i. Less than Significant Impact.

The Project Site is located in a developed area of the City, and no streams or river courses are located on or within the Project vicinity. Demolition of the existing buildings and construction of

29 Ardent Environmental Group Inc., *Subsurface Investigation Report, 5010 Azusa Canyon Road, Irwindale, California,* April 2017.

the two industrial buildings and associated parking areas would not substantially alter the existing drainage pattern of the Project Site. The Proposed Project would connect to the existing underground storm drain systems. Runoff from the Project Site would be directed to proposed landscape areas on-site from water quality treatment. Since the Project Site is already graded in a developed area complete with storm drain backbone systems in place, the Proposed Project would not alter the drainage patter that would cause siltation, flooding, or erosion on or off-site. Further, the Project proposes 48,465 square feet of landscape areas where none currently exists, therefor decreasing the amount on on-site impervious surfaces over existing conditions. Additionally, the City's Standard Conditions of Approval require the Project applicant to prepare a drainage study and to indicate drainage routes on the proposed grading plans, to be reviewed by the County drainage plan checker. As such, impacts would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

c. ii. Less than Significant Impact.

As discussed previously, there are no natural surface water features present on-site that could be altered as a result of implementing the Proposed Project. Thus, the Proposed Project would not substantially alter the existing conditions. Development of the Project Site largely involves replacement of existing impervious surfaces and would not result in a substantial increase in drainage patterns, peak flow rates, or runoff volumes from the Project Site. As previously stated, the Project proposes landscape areas where none currently exists. These landscaping features are designed to reduce runoff, and it is expected that implementation of the Proposed Project would result in a reduced rate and volume of run off from existing conditions. For this reason, implementation of the Proposed Project would not result in an increase for potential flooding on or off-site. As such, impacts would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

c. iii–iv. Less than Significant Impact.

As discussed previously, the Proposed Project would not substantially alter the existing on-site drainage pattern of the Project Site. Development of the Project Site largely involves replacement of existing impervious surfaces and would not result in a substantial increase in drainage patterns, peak flow rates, or runoff volumes or pollutants from the Project Site. Further, the proposed landscaping features are designed to reduce runoff, and it is expected that implementation of the Proposed Project would result in a reduced rate and volume of runoff from existing conditions.

The Proposed Project would not exceed the capacity of existing drainage systems. Collected runoff from the Project Site would be directed towards the existing storm drains within the Project vicinity, which currently have adequate capacity, and the two new storm drains proposed along the westernmost boundary of the Project Site, along Azusa Canyon Road. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any urban pollutants generated on the Project Site would be subject to the requirements and regulations of the NPDES, which the Proposed Project would be required to meet.

The Project Site is not located within an area subject to flooding by the 100-year chance flood.[30] Therefore, the Proposed Project would not place housing within a 100-year flood hazard area or result in structures being constructed that would impede or redirect flood flows. The Proposed Project would not be subject to flooding. As such, no impacts would occur.

The Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems; provide substantial additional sources of polluted runoff; or impede or redirect flood flows. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Tsunamis are large-scale sea waves produced from tectonic activities along the ocean floor. Seiches are freestanding or oscillatory waves associated with large enclosed or semi enclosed bodies of water. The Project Site is located approximately 0.5 miles south of the Santa Fe Dam, which is an area likely to be subject to a seiche. Although the Project Site is located downslope from the Santa Fe Dam, for most of the year, the dam and its reservoir lie empty. Additionally, the Santa Fe Damn is routinely inspected and continually evaluated for safety and compliance with Federal Guidelines for Dam Safety.[31]

The Project Site is not located near any coastal areas, which are subject to tsunamis. The Project Site is located approximately 30.9 miles inland from the Pacific Ocean and at an elevation of approximately 468 feet above mean sea level. As such, based on the distance and elevation from the Pacific Ocean, the risk of a tsunami affecting the Project Site is low. The Project Site is located near the San Gabriel River, which is not subject to significant mudflows since there are no slopes or mountainous areas that would contribute to mudflow risks.

30 City of Irwindale, *General Plan,* "Public Safety Element," June 2008, Exhibit 6-3.

31 FEMA, *Federal Guidelines for Dam Safety*, accessed December 2018, https://www.fema.gov/media-library-data/20130726-1516-20490-7951/fema-333.pdf.

The Santa Fe Damn, located approximately 0.5 north of the Project Site, is a flood risk management damn located on the San Gabriel River and is owned and operated by the United States Army Corps of Engineers (USACE), in the Los Angeles District. The primary purpose of the Santa Fe Dam is to reduce the risk of flood damage for the densely populated area between the dam and Whitter Narrows Reservoir. According to Map 2-13 of the City's Hazard Mitigation Plan, the Project Site is located within the downstream inundation area of for the Santa Fe Dam.[32] In 2009, the Santa Fe Dam received a Dam Safety Action Class II (DSAC II) rating based on a Screen Portfolio Risk Analysis, which means dam failure could begin during normal operations or be initiated as the consequence of an event such as an earthquake.[33] As a result of the Santa Fe Dam's DSAC II rating, USACE has implemented Interim Risk Reduction Measures to ensure the safety of the Santa Fe Dam. As part of the USACE's responsibility in managing the Santa Fe Damn, the USACE has a comprehensive Dam Safety Program that has public safety as its primary objective.[34] It should be noted that the Proposed Project would introduce structures similar to on and off-site land uses within the dam inundation area, meaning exposure of the general public and structures to inundation hazards would remain the same relative to existing conditions. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact.

A site-specific hydrology study was prepared for the Project to determine whether Project development would result in a measurable increase in water flows exiting the site under developed conditions beyond those permissible by the Los Angeles County Department of Public Works. The Proposed Project will be also required to prepare a Water Quality Management Plan (WQMP) and then implement all appropriate BMPs described within the WQMP. The Project proposes two sets of MC-3500 StormTech chambers. The chamber set, located east of Building 1, will consist of 160 chambers (29, 124 CF minimum). The chamber set, located southwest of Building 2, will consist of 24 chambers (4,396 CF minimum). These systems will utilize infiltration as their primary form of treatment. The Project would not conflict with or obstruct implementation of a water quality control plan of groundwater management plan. For these reasons, no impacts in this regard would occur.

Mitigation Measures: No mitigation measures are required.

32 City of Irwindale, *Hazard Mitigation Plan*, Map 2-13: Dam Inundation Area.
33 US Army Corps of Engineers, "Dam Safety Program: Santa Fe Dam," accessed December 2018 https://www.spl.usace.army.mil/Media/Fact-Sheets/Article/477342/dam-safety-program/.
34 US Army Corps of Engineers, "Dam Safety Program: Santa Fe Dam."

5.11 LAND USE AND PLANNING

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion

a. No Impact.

The Project Site is located within a developed portion of the City and is consistent with the existing physical arrangement of the properties within the vicinity of the site. The Proposed Project would replace existing industrial and commercial buildings provide new industrial/business park uses within the City, consistent with the General Plan land use designation for the site. The proposed industrial/business park uses would be compatible with the surrounding industrial, commercial, and residential uses. No established community would be divided, nor would there be a disruption of access between land use types as a result of the Proposed Project. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

The General Plan land use designation for the Project Site is currently Industrial/Business Park, which intends for the development of industrial buildings of varying sizes attached, detached, and/or mixed residential uses with a range of densities and housing types. The zoning designations for the Project Site are currently M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing).

The Project Site is zoned M-1 (Light Manufacturing) and M-2 (Heavy Manufacturing), designated Industrial/Business Park by the City's General Plan, and subject to the Irwindale Commercial and Industrial Design Guidelines. The Industrial designation corresponds to the C-M (Commercial Manufacturing), M-1, and M-2 zones. The maximum FAR for this General Plan designation is 1.0 to 1.0. The Project is consistent with the applicable FAR standard as the FAR of the Project ranges from 0.48 to 0.51. For these reasons, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.12 MINERAL RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

a. No Impact.

According to the City's General Plan, the Project Site occurs within an area that has been classified as Mineral Resource Zone 2 (MRZ-2),[35] which are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. While the Project Site is located within an area containing potentially significant mineral resources, the Project Site itself has been developed as an industrial/business park since 1966. The Project Site is located in an industrial/business park are that has been designated for such uses in the General Plan. The Project Site is also not located in the City's Quarry Overlay Zone.

The Proposed Project involves the demolition of existing on-site buildings and structures, and the development of two stand-alone concrete tilt-up buildings and associated parking primarily used for warehouse purposes. Accordingly, no mineral resources would be made unavailable due to this Project. Therefore, the Project would have no potential to result in the loss of mineral resource of value to the region or residents of the State. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

As described in the General Plan, the City's Quarry Zone is used to designate those areas where quarries and related sand and gravel industries could locate. The Quarry Zone is also used to recognize the location of mineral deposits identified as regionally significant by the state. The Project Site is not within the Quarry

35 City of Irwindale, *General Plan,* "Resource Management Element," June 2008.

Overlay Zone.[36] However, quarries are conditionally permitted in the M-2 zone per IMC 17.56.020(33). As previously mentioned, the Project Site is not delineated as a locally important mineral resource recovery site on a local land use plan. Therefore, the Proposed Project would not result in the loss of availability of locally important mineral resource recover site. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

36 City of Irwindale, *Zoning Map (2018)*, accessed December 2018, http://ci.irwindale.ca.us/DocumentCenter/View/40.

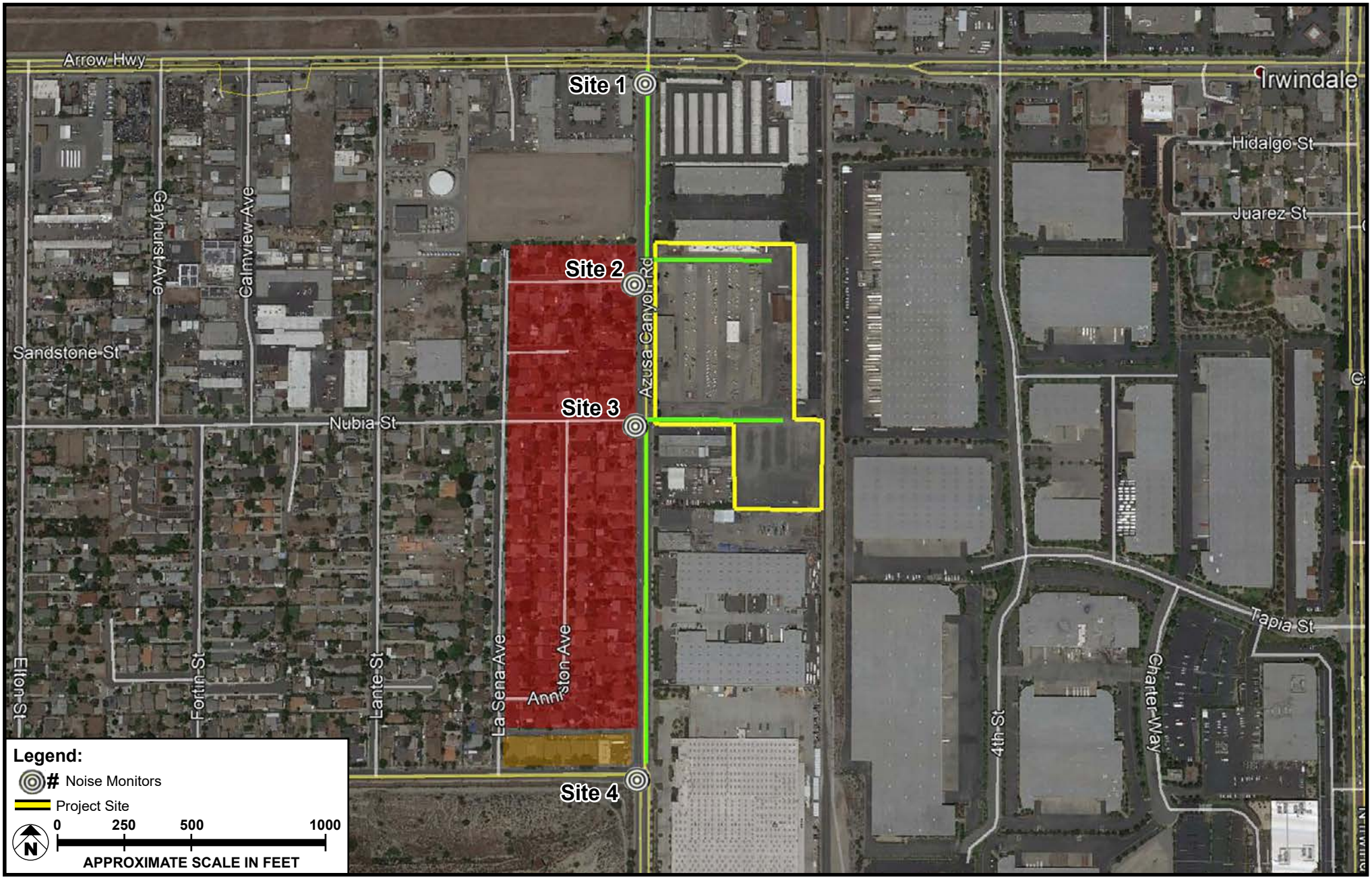
5.13 NOISE

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project result in:					
a.	Generation of a substantial temporary or permanent increase in ambient noise levels the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b.	Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a. Less than Significant with Mitigation.

Short-term noise was conducted at four (4) locations to measure the ambient noise environment in the Project vicinity. Measurements were taken over 15-minute intervals at each location on December 10, 2018, as shown in **Table 5.13-1: Ambient Noise Measurements. Figure 5.13-1: Noise Monitoring Locations,** depicts the locations where ambient noise measurements were conducted and the surrounding sensitive receptors. As shown in **Table 5.13-1,** noise levels ranged from a low of 65.6 dBA at the corner of Azusa Canyon Road and Nubia Street (Site 3) to a high of 76.4 dBA on the corner of Arrow Highway and Azusa Canyon Road (Site 1).



SOURCE: Google Earth - 2018

FIGURE **5.13-1**

Meridian Consultants

Noise Monitoring Locations

227-001-18

Table 5.13-1
Ambient Noise Measurements

Location Number/Description	Nearest Use	Time Period	Noise Source	dBA Leq
1 Corner of Azusa Canyon Road and Arrow Highway	Commercial	10:29 AM–10:44 AM	Heavy traffic along Arrow Highway and Azusa Canyon Road	76.4
2 Corner of Azusa Canyon Road and Sandstone Street	Single-family residential	11:05 AM–11:20 AM	Traffic along Azusa Canyon Road	67.8
3 Corner of Azusa Canyon Road and Nubia Street	Single-family residential	11:40 AM–11:55 AM	Traffic along Azusa Canyon Road	65.6
4 Azusa Canyon Road and Olive Street	Single-family residential	12:02 PM–12:17 PM	Heavy traffic along Olive Street and Azusa Canyon Road	73.2

*Source: Refer to **Appendix G** for noise monitoring data sheets.*

Construction

As stated in Section 9.28.110 of the City's Municipal Code, it is unlawful for any person within a residential zone, or within a radius of five hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick steam or electric hoist or other construction type device on a development requiring a city permit, in such a manner that noise is produced which could constitute a violation of Section 9.28.040 of the City's Municipal Code, unless beforehand authorization therefor has been duly obtained from the building inspector. Construction will be limited to 7:00 AM to 7:00 PM Monday through Saturday, and construction activity is unlawful without a permit all hours on Sunday and holidays.

The Proposed Project would be constructed over a 9-month period, beginning December 2019. Development activities would involve the following sequence: (1) demolition; (2) grading; (3) building construction; and (4) construction of site improvements, including paving.

The range of maximum noise levels for various types of construction equipment at 50 feet are shown in **Table 5.13-2: Project Construction Equipment Noise Levels**. The noise values represent maximum noise generation, or full-power operation of the equipment. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project Site.

Table 5.13-2
Project Construction Equipment Noise Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Air compressor	78
Crane	81
Excavator	81
Loader	79
Man lift	75
Scraper	84
All other equipment > 5 HP	85

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, January 2006.
Note: HP = horsepower.

Sound generated by the construction noise source typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers—such as walls, berms, or buildings, and elevation differences—can also reduce sound levels by up to 20 dBA.[37]

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required. As would be the case for construction of most land use development projects, construction of the Proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level. The noise levels at the residential uses approximately 75 feet to the west from the Project Site across Azusa Canyon Road are shown in **Table 5.13-3: Construction Maximum Noise Estimates**.

Implementation of **Mitigation Measure MM NOI-1** would include the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques. Noise reduction techniques include a construction management plan which specifies that all construction equipment, fixed or mobile, will be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices; identify the maximum distance between construction equipment staging areas and occupied residential areas; and require the use of electric air compressors and similar power tools.

37 Caltrans, *Technical Noise Supplement* (1998), 33–40, 123–131.

Table 5.13-3
Construction Maximum Noise Estimates

Use	Distance from Project Site (feet)	Max Leq	Ambient Noise Leq (dBA)	Maximum Noise Increase over Ambient
Single-family residential	75	86.4	65.6	+20.8

*Source: Refer to **Appendix G** for construction noise worksheets*

A sign, legible at a distance of 50 feet, will be posted at the Project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign will indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator will be posted on the sign. The coordinator will be responsible for responding to any local complaints about construction noise and will notify the City to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the City.

Construction activities would include the use of a temporary sound barrier when the use of heavy equipment is prevalent (during the demolition and site clearing phase), which would result in a minimum of 15 dB reduction. A sound barrier with a sound transmission classification rating of 25 could reduce noise levels by 15 to 22 dB on both sides of the equipment where the curtain is installed.[38] Furthermore, optimal muffler systems for all equipment and the break in line of sight to a sensitive receptor would reduce construction noise levels by approximately 10 dB or more.[39] Limiting the number of noise-generating heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously used on the Project Site within 100 feet of off-site noise sensitive receptors surrounding the site to no more than one or two pieces of heavy-duty off-road equipment would further reduce construction noise levels by approximately 10 dBA. As such, compliance with the City's Noise ordinance and implementation of **MM NOI-1** would reduce impacts to less than significant.

Operation

The California General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR), provides guidance for the acceptability of specific land use types within areas of specific noise exposure.

38 Behrens and Associates Environmental Noise Control, "Temporary Compressor Sound Walls," http://www.drillingnoisecontrol.com/tempcompressor.html.

39 FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm, accessed December 2018.

Table 5.13-4: Land Use Compatibility for Community Noise Environments, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Table 5.13-4
Land Use Compatibility for Community Noise Environments

	Community Noise Exposure (dBA CNEL)			
	Normally Acceptable[a]	**Conditionally Acceptable[b]**	**Normally Unacceptable[c]**	**Clearly Unacceptable[d]**
Residential-low density, single-family, duplex, mobile homes	50–60	55–70	70–75	Above 70
Residential – multiple family	50–65	60–70	70–75	Above 70
Transit lodging – motel, hotels	50–65	60–70	70–80	Above 80
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	Above 80
Auditoriums, concert halls, amphitheaters	N/A	50–70	N/A	Above 65
Sports arenas, outdoor spectator sports	N/A	50–75	N/A	Above 70
Playgrounds, neighborhood parks	50–70	N/A	67–75	Above 72
Golf courses, riding stables, water recreation, cemeteries	50–70	N/A	70–80	Above 80
Office buildings, business commercial and professional	50–70	67–77	Above 75	N/A
Industrial, manufacturing, utilities, agriculture	50–75	70–80	Above 75	N/A

Source: OPR 2003.

CNEL = community noise equivalent level; NA = not applicable.

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.*

[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.*

[c] *Normally Unacceptable: New construction or development should be discouraged. If new construction of development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.*

[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

The City does not have a specific noise criterion for evaluating off-site noise impacts to residences or noise-sensitive areas from Project-related traffic. For the purposes of this noise analysis, such impacts are considered significant when they cause an increase of 10 dBA above existing noise levels when exceeding normally acceptable and conditionally acceptable levels, as stated in the City's municipal code Section 9.28.100. It is important to note, an increase or decrease in noise level of at least 5 dBA is required before a noticeable change in community responses would be expected. Therefore, a clearly perceptible increase (5 dBA) in noise exposure of sensitive receptors could be considered significant.

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with net new daily trips. The noise level associated with the additional traffic volume for existing without Project, existing with Project, future without Project, future with Project, future baseline plus cumulative without Project, and future baseline plus cumulative with Project are depicted in **Table 5.13-5: Traffic Noise Projections**. As shown in **Table 5.13-5**, the Proposed Project would result in a max change in traffic noise levels of 6.8 dBA at Nubia Street east of Azusa Canyon Road during the AM peak hour. However, noise levels would be 46.0 dBA, below the normally acceptable and conditionally acceptable noise levels (refer to **Table 5.13-4**)**-** for both residential and industrial uses. In addition, as shown in **Table 5.13-1** above, the roadway noise levels are below the designated ambient noise levels within an industrial zone of 70 dBA during the daytime (7:00 AM to 10:00 PM) and 60 dBA during the night time (10:00 PM to 7:00 AM). All other intersection increases would be below the significance threshold of five dBA. Thus, the additional traffic volume along the adjacent roads of the Project Site would not substantially increase the existing noise level in the Project vicinity, and operational traffic-related noise impacts would be less than significant.

The Proposed Project would not generate any uses that would result in a permanent increase in ambient noise levels. As explained previously, the Project's operational noise impacts from off-site mobile sources associated with net new daily trips would not substantially increase the existing noise level in the Project vicinity.

As stated above, the Proposed Project would generate temporary elevated noise levels due to the construction phase of the Proposed Project. While construction activities would generate short-term noise, the proximity of construction activities to the nearby sensitive uses to the west of the Project Site would result in significant impacts.

Table 5.13-5
Traffic Noise Projections

Intersection	Time Period	Existing without Project	Existing with Project	Different (Existing Without Project and Existing with Project)	Future without Project	Future with Project	Difference (Future Without Project and Future with Project)	Future Baseline plus Cumulative without Project	Future Baseline plus Cumulative with Project	Difference (Future Baseline plus Cumulative without Project and Future Baseline plus Cumulative with Project
Azusa Canyon Road										
North of Sandstone Street	AM	59.8	60.5	0.7	59.9	60.6	0.7	60.1	60.8	0.7
	PM	59.0	59.8	0.8	59.1	59.8	0.7	59.5	60.2	0.7
South of Sandstone Street	AM	59.7	60.0	0.3	59.8	60.1	0.3	60.1	60.4	0.3
	PM	58.9	59.3	0.4	59.0	59.4	0.4	59.4	59.7	0.3
North of Nubia Street	AM	59.7	60.0	0.3	59.8	60.1	0.3	60.1	60.6	0.5
	PM	61.2	61.4	0.2	61.3	61.5	0.2	61.7	61.9	0.2
South of Nubia Street	AM	60.1	60.1	0.0	60.2	60.2	0.0	60.4	60.5	0.1
	PM	59.3	59.4	0.1	59.4	59.5	0.1	59.8	59.9	0.1
Sandstone Street										
East of Azusa Canyon Road	AM	N/A	45.2	—	N/A	45.2	—	N/A	45.2	—
	PM	N/A	44.7	—	N/A	44.7	—	N/A	44.7	—
West of Azusa Canyon Road	AM	42.5	42.5	0.0	42.5	42.5	0.0	42.5	42.5	—
	PM	43.4	43.4	0.0	43.4	43.4	0.0	43.4	43.4	—
Nubia Street										
East of Azusa Canyon Road	AM	39.2	43.2	4.0	39.2	43.2	4.0	39.2	46.0	6.8
	PM	N/A	40.6	—	N/A	40.6	—	N/A	40.6	—
West of Azusa Canyon Road	AM	49.7	49.7	0.0	49.8	49.8	0.0	49.8	49.8	0.0
	PM	51.2	51.2	0.0	51.3	51.3	0.0	51.3	51.3	0.0

*Source: Refer to **Appendix G** for roadway noise calculation worksheets.*

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

NOI-1 Construction Noise Reduction

- The Project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by City personnel during construction activities.
- Construction noise reduction methods such as shutting off idling equipment, maximizing the distance BETWEEN construction equipment staging areas and nearby sensitive receptors, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
- During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event that the City received a complaint, appropriate corrective actions shall be implemented and a report of the actin provided to the reporting party.

b. Less than Significant Impact.

The City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans *Transportation and Construction Vibration Guidance Manual*[40] is used as a screening tool to assess the potential for adverse vibration effects related to structural damage. As such, Project construction activities that would cause ground-borne vibration levels to exceed 0.5 inches per second (ips) peak particle velocity (PPV) at the nearest off-site residential buildings.

The Proposed Project would be constructed using typical construction techniques. As no pile driving for construction would be necessary, significant vibration impacts from pile installation would not occur.

40 Caltrans, *Transportation and Construction Vibration Guidance Manual* (September 2013), http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

Heavy construction equipment (e.g. bulldozer and excavator) would generate a limited amount of ground-borne vibration during construction activities at short distances away from the source. The use of equipment would most likely be limited to a few hours spread over several days during grading activities.

Table 5.13-6: Construction Vibration-Level Estimates lists the vibration source levels at varying distances of the assumed construction equipment to be used during construction. As shown in **Table 5.13-6**, air compressors are capable of producing approximately 0.017 ips peak PPV at 75 feet and would not generate vibration levels in excess of 0.5 ips PPV. The single-family residences to the west of the Project Site with regard to construction vibration would not be affected as a result of attenuation of ground-borne vibration. Furthermore, construction activities would be restricted to daytime hours, when people are the least sensitive to vibration intrusions. Ground-borne vibration and noise levels associated with the Proposed Project would be less than significant.

Table 5.13-6
Construction Vibration-Level Estimates

	PPV ips at Adjusted Distance
Equipment	**Single Family Residences at 75 feet**
Air compressor	0.017
Crane	0.011
Excavator	0.008
Loader	0.014
Scraper	0.011

Source: CalTrans Transportation and Construction Vibration Guidance Manual, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf, accessed December 2018.
Notes: ips = inches per second; PPV = peak particle velocity.

Mitigation Measures: No mitigation measures are required.

c. No Impact.

The closest airport to the Project Site is the El Monte Airport, which is located approximately 5.35 miles to the southwest of the Project Site. Therefore, the Proposed Project would not be located within an airport land use plan or within 2 miles of a public airport or public use airport. The Project would not expose people residing or working in the area to excessive noise levels. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5.14 POPULATION AND HOUSING

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

Discussion

a. Less than Significant Impact.

The Proposed Project involves the demolition of existing on-site buildings and structures, and the development of two stand-alone concrete tilt-up buildings and associated parking. Employment created by the Proposed Project would create short-term construction jobs. It is anticipated that the Project would not directly affect population growth as compared with new residential development, because it is not creating homes. While the Proposed Project would generate employment opportunities, the jobs created are not expected to induce substantial growth in the City or region above the growth anticipated by the City's General Plan and the SCAG's regional growth forecasts. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

No residential dwelling units currently exist on the Project Site. Therefore, no housing or residential populations would be displaced by implementation of the Proposed Project, and the construction of replacement housing elsewhere would not be necessary. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

5.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

Discussion

a. i. Less than Significant Impact.

The Los Angeles County Fire Department (LACoFD) provides comprehensive emergency services for the City, including fire, rescue, and emergency medical (paramedic) services, as well as fire prevention and code enforcement functions.[41] LACoFD Fire Station No. 48, located at 15546 Arrow Highway approximately 0.18 miles north of the Project Site, would serve as the first responder in the event of an emergency. LACoFD Fire Station No. 29, located at 14334 Los Angeles Street, Baldwin Park, (approximately 1.38 miles southwest of the Project Site), would provide secondary response for any incident. In the event the units from Fire Station Nos. 48 or 29 are not available, other units would be available for dispatch from other LACoFD fire stations or adjacent jurisdictions. These LACoFD stations can respond to an incident at the Project Site and would continue to provide these fire protection services upon implementation of the Proposed Project.

Given that the Proposed Project is not expected to generate new residents to the City, the Proposed Project would not increase the demand for LACoFD services. The Proposed Project would be compatible with the City's land use and zoning designations for the site and would not add any uses not already forecasted by the City.

Furthermore, compliance with applicable fire code and the building code provisions determines a project's impact on fire services. The Proposed Project would be required to meet all code provisions to the satisfaction of the City and LACoFD. As a result, the Proposed Project would be

41 City of Irwindale, *General Plan,* "Public Safety Element."

adequately served by existing public services and would not necessitate the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and is therefore not anticipated to result in substantial adverse impacts. The overall need for fire protection services is not expected to substantially increase. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

ii. Less than Significant.

The Irwindale Police Department (IPD) provides police protection services to the Project Site from its station at 5050 North Irwindale Avenue, approximately 0.53 miles to the east.[42] The Project would introduce new buildings and employees to the Project Site, which would result in an incremental increase in demand for police protection services but is not anticipated to require or result in the construction of new or physically altered police stations. This small increase would not substantially affect provision of police protection given the location of the Proposed Project in an urbanized area and its proximity to existing police protection services. As such, the Proposed Project would not result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The overall need for police protection services would not increase substantially as a result of the Proposed Project. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Less than Significant Impact.

Development of the Project Site with industrial/business park and commercial uses would not create a direct demand for public school services, as the subject property would contain non-residential uses that would not generate any school-aged children requiring public education. The Proposed Project is not expected to draw a substantial number of new residents to the region and, therefore, would not indirectly generate a measurable number of school-aged students requiring public education.

Pursuant to California Government Code (GOV) Section 65995 (known commonly as SB 50), a school district may impose impact fees on non-residential development to offset impacts to schools. GOV Section 65995 also substantially limits the application of CEQA to school facilities

42 City of Irwindale, *General Plan,* "Public Safety Element."

impact issues. The fees set forth in GOV Section 65996 constitute the exclusive means of both considering and mitigating the impacts of development projects on school facilities. The provisions are "deemed to provide full and complete school facilities mitigation" (GOV Section 65996(b)). Because the statute states that the statutory fees are the exclusive means of addressing school impacts, payment of the mandated non-residential impact fee to the governing school district negates the need to address potential indirect effects to schools. As such, impacts to schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Less than Significant Impact.

The Proposed Project would not directly introduce new residents to the City, and therefore would not substantially increase demand for public park facilities to the extent that modification of existing facilities or construction of new park facilities would be necessary. Accordingly, implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

v. Less than Significant Impact.

The Proposed Project would not directly substantially increase the residential population of the City, and therefore is not expected to result in a demand for other public facilities or services, including libraries, community recreation centers, post offices, and animal shelters. Implementation of the Proposed Project would not adversely affect other public facilities or require the construction of new or modified public facilities. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.16 RECREATION

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b.	Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a. No Impact.

The Proposed Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the Proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. No Impact.

The Proposed Project will not construct any new on or off-site recreation facilities. The Project would not expand any existing off-site recreational facilities. Implementation of the Proposed Project would not result in impacts related to the construction or expansion of recreational facilities. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.17 TRANSPORTATION

		Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a.	Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☒	☐	☐
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d.	Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

The following section summarizes and incorporates by reference information from the Traffic Impact Analysis, dated July 12, 2019, (Traffic Study), prepared by Ganddini Group Inc. for the Proposed Project. The Traffic Study is included as **Appendix H** to this Initial Study. This report analyzes traffic impacts for the anticipated Project opening year in 2021.

a. Less than Significant with Mitigation.

Regional access to the Project Site would be provided from the I-605, I-210, and I-10 freeways. Local access is provided by surrounding roadways within the vicinity of the Project Site. The north–south roadways of Baldwin Park Boulevard, Azusa Canyon Road, and Irwindale Avenue and the east–west roadways of Live Oak Avenue, Arrow Highway and Cypress Street provide local circulation to the Project Site.

Local bus service is provided along Arrow Highway. Additionally, there is pedestrian access along Arrow Highway, Azusa Canyon Road, Sandstone Street, and Nubia Street, as well as bicycle access throughout the City. The Proposed Project would not conflict with any adopted policies, plans, or programs regarding alternative transportation because no changes to the existing transportation policies, plans, or programs would result from Project implementation.

The City requires the operation of unsignalized intersections be evaluated using the methodology described in Chapter 17 of the 2000 Highway Capacity Manual. The intersection LOS rating is based on an

intersection's average control delay, expressed in seconds per vehicle, which are found in **Table 5.17-1: LOS Definitions for Intersections.** The City has set the goal for acceptable LOS as LOS D or better at signalized intersections on arterial and collector streets and LOS E for signalized intersections on State Highway facilities. For unsignalized intersections, the minimum acceptable LOS recommended by the General Plan is LOS D. The City of Baldwin Park General Plan Policy 1.4 establishes LOS D as the minimum acceptable LOS for intersections during the AM and PM peak hours.

Table 5.17-1
LOS Definitions for Intersections

LOS	Description	Unsignalized Intersection Control Delay (seconds/vehicle)	Signalized Volume to Capacity (V/C)
A	Little or no delays	≤ 10.00	≤ 0.600
B	Short traffic delays	> 10.0 to ≤ 15.00	0.601 to 0.700
C	Average traffic delays	> 15.0 to ≤ 25.00	0.701 to 0.800
D	Long traffic delays	> 25.0 to ≤ 35.00	0.801 to 0.900
E	Very long traffic delays	> 35.0 to ≤ 50.00	0.901 to 1.000
F	Extreme traffic delays with intersection capacity exceeded	> 50.00	> 1.000

Source: Highway Capacity Model, Chapter 17, 2000 ***(refer to Appendix H)****.*
Note: LOS = Level of Service.

Estimated Trip Generation

Trip-generation estimates for the Proposed Project were calculated using the trip generation rates contained in *Trip Generation, 10th Edition* (Institute of Transportation Engineers, 2018).[43] **Table 5.17-2: Trip Generation Estimates—Daily Trips**, summarizes the trip generation rates used to arrive at the Proposed Project's trip generation estimates for the daily peak-hour periods.

As shown in **Table 5.17-2**, the Proposed Project would generate a net total of approximately 831 trip-ends per day with 90 AM peak hour trips (121 inbound trips and a reduction of 31 outbound trips) and 93 PM peak hour trips (a reduction of 2 inbound trips and 95 outbound trips). The Traffic Study analyzed the Proposed Project's forecasted traffic impacts, including existing conditions, existing plus Project

43 Institute of Transportation Engineers, *Trip Generation Manua*l, 10th ed., 2018.

conditions, opening year (2018) with and without Project conditions, and horizon year (2021) conditions with and without the Proposed Project.

Table 5.17-2
Trip Generation Estimates—Daily Trips

	AM Peak-Hour Volumes			PM Peak-Hour Volumes			Daily Trips
Land Use	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**Total**
Existing Use							
Service Yard	23	51	74	21	33	54	330
Proposed Project							
General Light Industrial	144	20	164	19	128	147	1,161
Net Total:	121	-31	90	-2	95	93	831

Source: Ganddini Group, Inc., Traffic Impact Analysis, July 12, 2019 ***(refer to Appendix H)****.*

Construction Traffic

The Proposed Project would require the use of trucks during site clearing and grading and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the City. The Proposed Project's construction trip traffic would be a fraction of the operational traffic, which would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that they could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. A construction work site traffic control plan would be submitted to the City for review and approval prior to the start of any construction work. The plan would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties.

Operational Traffic

The analyzed locations are shown in the Traffic Study and correspond to locations where potential traffic impacts from the Proposed Project are most likely to occur. The intersections identified for analysis are as follows:

1. I-605 SB On-Ramp (NS) at Live Oak Avenue (EW)

2. I-605 NB Off-Ramps (NS) at Live Oak Avenue (EW)
3. Graham Access Road (NS) at Live Oak Avenue (EW)
4. Live Oak Lane (NS) at Live Oak Avenue (EW)
5. Rivergrade Road (NS) at Live Oak Avenue (EW)
6. Stewart Avenue (NS) at Live Oak Avenue (EW)
7. Baldwin Park Boulevard (NS) at Live Oak Avenue (EW)
8. Arrow Highway (NS) at Live Oak Avenue (EW)
9. Maine Avenue (NS) at Arrow Highway (EW)
10. Azusa Canyon Road (NS) at Arrow Highway (EW)
11. Azusa Canyon Road (NS) at Sandstone Street (EW)
12. Azusa Canyon Road (NS) at Nubia Street (EW)
13. 4th Street (NS) at Arrow Highway (EW)
14. Irwindale Avenue (NS) at Arrow Highway (EW)
15. I-605 SB Off-Ramp (SB) at Arrow Highway (EW)
16. Irwindale Avenue (NS) at I-210 WB Off-Ramp (WB)

Project Impacts

Existing Conditions without Project

As discussed in the Traffic Study, and shown below in **Table 5.17-3: Existing Intersection Levels of Service**, the intersection operations analysis of existing conditions without the Proposed Project indicates that the following study area intersections are currently operating at an unacceptable LOS, during the both the AM and PM peak hour I-605 NB Off-Ramps (NS) at Live Oak Avenue (EW), Live Oak Lane (NS) at Live Oak Avenue (EW) are operating at a LOS of F. During the PM peak hour, Rivergrade Road (NS) at Live Oak Avenue (EW), Stewart Avenue (NS) at Live Oak Avenue (EW), Arrow Highway (NS) at Live Oak Avenue (EW), Maine Avenue (NS) at Arrow Highway (EW), Azusa Canyon Road (NS) at Arrow Highway (EW) all do not operate within acceptable LOS.

Table 5.17-3
Existing Intersection Levels of Service

Study Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		V/C or [Delay]	LOS	V/C or [Delay]	LOS
I-605 SB On-Ramp (NS) at Live Oak Avenue (EW)	TS	0.567	A	0.813	D
I-605 NB Off-Ramps (NS) at Live Oak Avenue (EW)	CSS	[99.9]	F	[99.9]	F
Graham Access Road (NS) at Live Oak Avenue (EW)	TS	0.643	B	0.666	B
Live Oak Lane (NS) at Live Oak Avenue (EW)	CSS	[53.9]	F	[64.0]	F
Rivergrade Road (NS) at Live Oak Avenue (EW)	TS	0.644	B	1.018	F
Stewart Avenue (NS) at Live Oak Avenue (EW)	TS	0.820	D	0.909	E
Baldwin Park Boulevard (NS) at Live Oak Avenue (EW)	TS	0.613	B	0.836	D
Arrow Highway (NS) at Live Oak Avenue (EW)	TS	0.667	B	0.987	E
Maine Avenue (NS) at Arrow Highway (EW)	TS	0.755	C	0.972	E
Azusa Canyon Road (NS) at Arrow Highway (EW)	TS	0.899	D	0.994	E
Azusa Canyon Road (NS) at Sandstone Street (EW)	CSS	[13.4]	B	[14.3]	B
Azusa Canyon Road (NS) at Nubia Street (EW)	CSS	[25.9]	D	[20.6]	C
4th Street (NS) at Arrow Highway (EW)	TS	0.693	B	0.667	B
Irwindale Avenue (NS) at Arrow Highway (EW)	TS	0.896	D	0.850	D
I-605 SB Off-Ramp (SB) at Arrow Highway (EW)	TS	0.696	B	0.514	A
Irwindale Avenue (NS) at I-210 WB Off Ramp (WB)	TS	0.507	A	0.558	A

Existing Conditions with Project

The Proposed Project is forecast to result in a significant traffic impact at the following study intersections for existing conditions with the Proposed Project:

- I-605 NB Off-Ramp (NS) at Live Oak Avenue (EW)
- Azusa Canyon Road (NS) at Arrow Highway (EW)
- Irwindale Avenue (NS) at Arrow Highway (EW)
- I-605 SB On-Ramp (NS) at Live Oak Avenue (EW)
- I-605 SB Off-Ramp (SB) at Arrow Highway (EW)

However, as outlined in Traffic Impact Analysis included as **Appendix H** of this Initial Study, the recommended mitigation measures would result in a less than significant impact regarding existing conditions with the Project.

Fair Share Contribution

MM TRA-1 (Intersection #2), MM TRA-4 (Intersection #1) and MM TRA-5 (Intersection #15) are located within Caltrans right-of-way. For MM TRA-1 (Intersection #2) and MM TRA-5 (Intersection #15), the Project Applicant shall participate in existing fee programs previously established by the City and accepted by Caltrans. The fees are based on a pro-rata fair share cost per trip for the daily average volume generated by each Project.

Additionally, for MM TRA-4 (Intersections #1), MM TRA-2 (Intersection #10) and MM TRA-3 (Intersection #14), the applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study, included as **Appendix H** of this Initial Study.

As mentioned previously, the Project would not conflict with a program plan, ordinance, or policy addressing alternative transportation such as transit, bicycle, and pedestrian facilities. Implementation of mitigation measures **MM TRA-1**, **MM TRA-2**, **MM TRA-3**, **MM TRA-4**, and **MM TRA-5**. shall be incorporated as part of the Proposed Project, to ensure impacts related to traffic to is reduced to a level of less than significant level.

Mitigation Measures: The following mitigation measures are proposed to reduce impacts to a less than significant level.

MM TRA-1 The following improvement at I-605 NB On-Ramp (NS) at Live Oak Avenue (EW) (Intersection 2) if implemented, would result in less than significant impact

- Install a traffic signal

- Construct a second right turn lane at the northbound approach
- Construct a second right turn lane at the southbound approach

Project Applicant shall participate in existing fee programs previously established by the City and accepted by Caltrans toward the cost of these improvements.

MM TRA-2 The following improvement at Azusa Canyon Road (NS) at Arrow Highway (EW) (Intersection 10) if implemented, would result in less than significant impact:

- Restripe the eastbound approach to provide a third though lane (with shared right turns).

Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (**Appendix H**) toward the cost of these improvements.

MM TRA-3 The following improvement at Irwindale Avenue (NS) at Arrow Highway (EW) (Intersection 14) if implemented, would result in less than significant impact:

- Restripe the westbound approach to provide a dedicated right turn lane

Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (**Appendix H**) toward the cost of these improvements.

MM TRA-4 The following improvement at I-605 SB On-Ramp (NS) at Live Oak Avenue (EW) (Intersection 1) if implemented, would result in less than significant impact:

- Construct a second left turn lane at the westbound approach. *

*Note: requires westbound approach widening the ramp widening to accommodate an additional receiving lane.

Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (Appendix H) toward the cost of these improvements.

MM TRA-5 The following improvement at I-605 SB Off-Ramp (SB) at Arrow Highway (EW) (Intersection 15) if implemented, would result in less than significant impact:

- Construct a second left turn lane at the southbound approach. *

  *Note: requires southbound off-ramp widening to accommodate a second left turn lane.

Project Applicant shall participate in existing fee programs previously established by the City and accepted by Caltrans toward the cost of these improvements.

b. Less than Significant Impact.

The City and the San Bernardino County Congestion Management Program (CMP) utilize the criterion that intersection-monitoring locations must examined if a project would add 50 or more trips during either the weekday AM or PM peak hours. Based on the Proposed Project AM and PM peak hour volumes, the Proposed Project is not forecasted to add 50 peak hour trips or more to CMP-monitored intersections nor is the Proposed Project forecast to add 150 peak hour trips or more to CMP-monitored freeway locations. As discussed above in **Threshold a**, the Proposed Project would not generate traffic that would result in intersection operations that do not meet acceptable level of service criteria established by the City. Therefore, the Proposed Project would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

All intersections, circulation improvements, and access to the Project Site would be designed consistent with City roadway standards and would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. The Proposed Project does not include any other Project elements that would potentially create a hazard to the public. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

The Proposed Project would provide adequate access to the Project Site, including access for emergency vehicles. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through and around any required road closures in accordance with the City's Multi-Hazard Functional Plan. Operation of the Proposed Project would not interfere with the City's Multi-Hazard Functional Plan as the Project would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, and state federal requirements related to emergency access and evacuation plans. The Proposed Site plan, including the access driveways, would be reviewed and approved by the County's Fire Department during plan check review. Adherence to these requirements would ensure that adequate emergency access is provided. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a. 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:				
i. 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	☐	☐	☐	☒
ii. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

The following section summarizes and incorporates by reference information from the Historic Resources Assessment, dated May 2018 (Historical Assessment), prepared by Environmental Science Associates (ESA) for the Proposed Project. The Historical Assessment is included as **Appendix C** to this Initial Study. This section also provides information gathered through the AB 52 Consultation process.

a. i. No Impact

As discussed in **Section 5.5: Cultural Resources**, The Project Site is currently developed with four buildings and a vehicle maintenance structure. The Project Site was historically used for agricultural purposes from 1928 until 1952. In approximately 1957, the site began use as a telecommunication maintenance yard. In 1966, the existing Office Building, Supply Building, Larger Storage, Building, and Truck Wash Tunnel were constructed. The Cultural Report did not identify any historic-period archaeological sites located on the Project Site. Therefore, the Proposed Project would not involve any activities that would cause a substantial adverse change to a historic resource. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

a. ii. Less than Significant Impact with Mitigation.

Assembly Bill (AB) 52, signed into law in 2014, established a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources (TCRs) as defined in Section 21074 of the PRC. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. On December 17, 2018, the City mailed notices to total of six (6) Native American tribes known to be affiliated with the Project area informing them of the Project (refer to **Appendix C** of this Initial Study). One Tribal member, Andrew Salas, Admin Specialist of the Gabrieleño Band of Mission Indians–Kizh Nation responded and requested formal consultation, which occurred on March 14, 2019.

Mitigation Measures: The following mitigation measures are proposed to reduce impacts to a less than significant level.

TCUL-1

Retain a Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work

may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and

Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

Unanticipated Discovery of Human Remains and Associated Funerary Objects:
Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

Resource Assessment & Continuation of Work Protocol:
Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner.

Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

Kizh- Gabrieleño **Procedures for burials and funerary remains:**
If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been

placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Treatment Measures:
Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Professional Standards: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

5.19 UTILITIES AND SERVICE SYSTEMS

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

Discussion

a. Less than Significant Impact.

No new sources of water supply, such as groundwater, are required to meet the Proposed Project's water demand. Water serving the Proposed Project would be treated by existing extraction and treatment facilities. No new facilities or expansion of existing facilities would be required. As such, impacts would be less than significant.

The Proposed Project would not produce substantial amounts of additional runoff to the existing stormwater drainage facilities. As discussed in **Section 5.10: Hydrology and Water Quality**, the Proposed Project would incorporate design features, such as landscaping features which would collect stormwater runoff on site or to surrounding storm drains. As a result, the Proposed Project would not require any substantial changes to the existing drainage pattern of the Project Site or surrounding area, nor would it affect the capacity of the existing storm drain system. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

Given that the current operation of industrial/business park uses on the Project Site, the Proposed Project would not result in an increase in potable water demand compared to existing conditions.

Valley County provides water service to residential, commercial, institutional, and industrial land uses as well as landscape irrigation.

Since Valley County does not anticipate any problem meeting the water demands and the Proposed Project's water demand would be nominal compared to the overall demands of the Valley Water Company's (VWC) service area, the Proposed Project would not significantly impact water services. Additionally, the Proposed Project would be required to obtain a will serve letter from the VWC prior to connection to verify the City has sufficient supply service to the Project Site. As such, impacts would be less than significant.

Grading and construction activities associated with the Proposed Project would require the use of water for dust control and cleanup purposes. The use of water during construction would be short term in nature. Therefore, construction activities are not considered to result in a significant impact on the existing water system or available water supplies.

Operation of the Proposed Project would increase the daily demand for potable water supplied by the City. The Project Site is located within the VWC service area. San Gabriel provides public utility water service within its service area, which includes all portions of the cities of Azusa, Baldwin Park, Irwindale, and West Covina. The 2015 Valley Urban Water Management Plan (UWMP) concludes that the water supply is sufficient over the next 20 years.[44] Because the Proposed Project would be consistent with the City's land use and zoning designations, it would be consistent with the growth projections found within the UWMP. Furthermore, the Proposed Project would adhere to current standards, including the Green Building Code, to reduce demand on local water supplies, as well as any development impact fees.[45] As such, impacts to local water supply services would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact.

Wastewater from the Project Site would be treated at the nearby water treatment facilities, Sanitation District of Los Angeles County No. 22. The closest Water Reclamation Plants (WRPs) to the Project Site are

44 Valley Municipal Water District, *2015 Valley Municipal Urban Water Management Plan,* June 2016.
45 City of Irwindale, Municipal Code sec 15.10.

the San Jose Creek WRP and the Whittier Narrows WRP. The San Jose Creep WRP has the capacity to provide primary, secondary, and tertiary treatment for 100 million gallons per day (mgd) of wastewater and serves a large residential population of approximately one million people. The Whittier Narrows WRP has the capacity to provide primary, secondary, and tertiary treatment for 15 mgd of wastewater and serves a population of approximately 150,000 people. Based on the capacities of the WRPs, the wastewater generated by the Proposed Project would be nominal and would not exceed current capacities of the of the Joint Outfall System. Furthermore, the Proposed Project would be required to obtain a will serve letter to confirm that capacity exists to serve the Proposed Project prior to connection to the sewer trunk system. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact.

Solid waste on the Project Site would be deposited at the Azusa Land Reclamation CO. Landfill. The maximum permitted throughput rate at the Azusa Land Reclamation CO. Landfill is currently 8,000 tons per day, with a remaining capacity of 80.5 million cubic yards of solid waste.[46] Given that the Project Site is currently in an industrial/business park area and occupied by multiple buildings and structures, the Proposed Project is not expected to increase the amount of solid waste produced compared to existing conditions. The Proposed Project would not create a substantial demand on the City's existing landfill facilities. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation.[47] As such, impacts would be less than significant.

e. Less than Significant Impact.

Construction and operation of the Proposed Project would comply with federal, state, and local statues and regulations related to solid waste. Solid waste generated by the Proposed Project would not interfere with the California Integrated Waste Management Act, which requires that local municipalities implement programs to divert at least 50% of their solid waste from landfills. As such, impacts would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

46 CalRecycle, " Solid Waste Information System Facility Detail: Azusa Land Reclamation CO. Landfill (19-AA-0013)," accessed December 2018, https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-0013/.

47 City of Irwindale, Municipal Code, sec. 8.20, Solid Waste Collection and Salvage of Recyclable Material.

5.20 WILDFIRES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a. No Impact.

The Project is not located in or near state responsibility areas of land classified as very high fire hazard severity zones. As discussed in **Section 5.9: Hazards and Hazardous Materials** the Proposed Project will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided.

Construction of the Project may require temporary and/or partial street closures due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. However, the construction contractor would be required to notify the City of Irwindale Police Department and the LACoFD if construction activities would impede movement for first emergency response vehicles. The Project Applicant would also be required to develop an emergency response plan in consultation with the LACoFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Implementation of these requirements would be incorporated as a typical condition of approval. As such,

the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impacts would occur, and no mitigation measures are necessary.

***Mitigation Measures*:** No mitigation measures are required.

b. No Impact.

The Project is not located in or near state responsibility areas of land classified as very high fire hazard severity zones. The Project is located on flat land and would not change or exacerbate risk of wildfire or pollutant concentrations from a wildfire to Project building occupants. As such, no impact would occur, and no mitigation measures are necessary.

***Mitigation Measures*:** No mitigation measures are required.

c. No Impact.

The Project is not located in or near state responsibility areas of land classified as very high fire hazard severity zones. As discussed in **Section 5.19: Utilities and Service Systems**, the Project would not require the installation or maintenance of any infrastructure or utility improvements or additions. As such, impacts related to infrastructure modifications increase fire risk would not result in any impacts. No impact would occur, and no mitigation measures are necessary

Mitigation Measures: No mitigation measures are required.

d. No Impact.

The Project is not located in or near state responsibility areas of land classified as very high fire hazard severity zones. As previously discussed in **Section 5.9: Hazards and Hazardous Materials** and **Section 5.10: Hydrology and Water Quality,** the Project is not located near a potential flooding area, landslide area, and would not result in potential drainage changes. The Project would not expose people or structures to significant risks as a result of runoff, postfire slope instability, or drainage changes. As such, no impact would occur, and no mitigation measures are necessary.

Mitigation Measures: No mitigation measures are required.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Discussion

a. Less than Significant Impact.

The Project Site is located within an urbanized area that is surrounded by commercial, industrial, and residential uses. The Project Site contains four buildings and one structure: Office Building, Fleet Maintenance Building, Warehouse, storage area (Barn), and Truck Wash, and the remaining parcels are used for parking. The Project Site is relatively flat and contains no landscaping. No native vegetation or habitat exists on the site or within the Project vicinity. In addition, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. As such, the Proposed Project would not have the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Furthermore, the Proposed Project would not have the potential to eliminate important examples of major periods of California history or prehistory, including historical, archaeological, or paleontological resources. Therefore, the Proposed Project would not result in significant environmental impacts that have the potential to substantially degrade the quality of the environment. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact.

Cumulative impacts may occur when the Proposed Project in conjunction with one or more related projects would yield an impact that is greater than what would occur with the development of only the Proposed Project. With regard to cumulative effects on agricultural, biological, and mineral resources, the Project Site is located in a developed area; therefore, other developments occurring in the area of the Proposed Project would largely occur on previously disturbed land. Thus, no cumulative impact to these resources would occur. Impacts related to archaeological resources, paleontological resources, and hazards and hazardous materials are generally confined to a specific site and do not affect off-site areas. As such, impacts would be less than significant.

Cumulative impacts can occur when the impacts of two or more separate projects are considerable when considered together. In the preceding topical analyses, cumulative impacts have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the Basin and the evaluation of traffic impacts considered the cumulative effect of other proposed projects in the immediate vicinity. Through the analyses, no significant cumulative impacts were identified for the Project.

Mitigation Measures: Please refer to mitigation measures MM TRA-1 to MM TRA-5 in Section 5.17, Transportation.

c. Less than Significant with Mitigation.

A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted in **Sections 5.1** through **5.20**.

Mitigation Measures: No mitigation measures are required.

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8.0 MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to ensure that mitigation measures and conditions of approval outlined in the Mitigated Negative Declaration (MND) prepared for the Irwindale Industrial Center Project (Project). When approving projects with MNDs that identify significant impacts, the California Environmental Quality Act (CEQA) requires public agencies to adopt monitoring and reporting programs or conditions of project approval to mitigate or avoid the identified significant effects (Public Resources Code Section 21081.6(a)(1)). A public agency is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The mitigation measures required by a public agency to reduce or avoid significant project impacts not incorporated into the design or program for the project may be made conditions of project approval as set forth in a MMRP. The program must be designed to ensure project compliance with mitigation measures during project implementation.

The MMRP includes the mitigation measures identified in the MND required to address the significant impacts associated with the proposed project. The required mitigation measures are summarized in this program; the full text of the impact analysis and mitigation measures is presented in the MND. The mitigation revisions in the MND include the addition of Mitigation Measures **MM TCUL-1**, **MM NOI-1** and **MM TRA-1** through **MM TRA-5**. The addition of these mitigation measures was made to reflect required implementation procedures in the MMRP.

The mitigation measures contained in this document are categorized according to the primary environmental impact designations listed in the Draft Environmental Impact Report and are shown in the MMRP.

B. MITIGATION MATRIX

The MMRP is organized in a table format (see **Table 8.0-1: Mitigation Monitoring and Reporting Program—Irwindale Industrial Center Project**), keyed to each significant impact and each EIR mitigation measure. Only mitigation measures adopted to address significant impacts are included in this program. Each mitigation measure is set out in full, followed by a tabular summary of monitoring requirements. The column headings in the tables are defined as follows:

Mitigation Measures adopted as Conditions of Approval: This column presents the mitigation measure identified in the MND.

Timing: The general schedule for conducting each mitigation task, identifying where appropriate both the timing and the frequency of the action.

Responsible Agency/Monitor: This column contains an assignment of responsibility for the monitoring and reporting tasks.

Signature/Date Completed: This column may be used by the lead agency to document the person who verified the implementation of the mitigation measure and the date on which this verification occurred.

C. ENFORCEMENT

All mitigation measures for significant impacts must be carried out in order to fulfill the requirements of approval. A number of the mitigation measures would be implemented during the course of the development review process. These measures would be referenced on architectural, development and similar plans, in technical reports, and in the field prior to construction. Most of the remaining mitigation measures would be implemented during the construction or project implementation phase.

Table 8.0-1
Mitigation Monitoring and Reporting Program
Irwindale Industrial Center Project

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
Cultural/Tribal Cultural Resources			
MM TCUL-1 • The Gabrieleño Band of Mission Indians–Kizh Nation tribe prepared the following mitigation measures, received April 26, 2019, that the City accepted on May 14, 2019. **Retain a Native American Monitor/Consultant:** • The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground	Preconstruction / During Construction	City of Irwindale Community Development Department	

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources. **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** • Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The			

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and **Public Resources Code Sections 21083.2(B) For Unique Archaeological Resources:** • Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes. **Unanticipated Discovery of Human Remains and Associated Funerary Objects:** • Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage			

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
Commission (NAHC) and PRC 5097.98 shall be followed. **Resource Assessment and Continuation of Work Protocol:** • Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. • Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). **Kizh–Gabrieleño Procedures for Burials and Funerary Remains:** • If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be			

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
considered as associated funerary objects. **Treatment Measures:** • Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. • Each occurrence of human remains and associated funerary objects will be stored			

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. **Professional Standards:** • Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.			
Noise			
MM NOI-1 **Construction Noise Reduction** • The Project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment. • All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by	Preconstruction; Pre-operation	City of Irwindale Community Development Department – Code Enforcement; City of Irwindale Public Works Department – Building and Safety	

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
random field inspections by City personnel during construction activities. • Construction noise reduction methods such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and nearby sensitive receptors, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible. • During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors. • During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors. • Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event that the City received a complaint, appropriate corrective actions shall be implemented and a report of the actin provided to the reporting party.			
Transportation			
MM TRA-1 The following improvement at I-605 NB On-Ramp (NS) at Live Oak Avenue (EW) (Intersection 2) if implemented would result in less than significant impact. • Install a traffic signal • Construct a second right turn lane at the northbound approach • Construct a second right turn lane at the southbound approach. Project applicant shall participate in existing fee programs previously established by the City and accepted by Caltrans towards the cost of these improvements.	Prior to the issuance of the first Building Permit	City of Irwindale Public Works Department	

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
MM TRA-2 The following improvement at Azusa Canyon Road (NS) at Arrow Highway (EW) (Intersection 10) if implemented, would result in less than significant impact: • Restripe the eastbound approach to provide a third through lane (with shared right turns). Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (**Appendix H**) toward the cost of these improvements.	Prior to the issuance of the first Building Permit	City of Irwindale Public Works Department	
MM TRA-3 The following improvement at Irwindale Avenue (NS) at Arrow Highway (EW) (Intersection 14) if implemented, would result in less than significant impact. • Restripe the westbound approach to provide a dedicated right turn lane. Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (**Appendix H**) toward the cost of these improvements.	Prior to the issuance of the first Building Permit	City of Irwindale Public Works Department	
MM TRA-4 The following improvement at I-605 SB On-Ramp (NS) at Live Oak Avenue (EW) (Intersection 1) if implemented, would result in less than significant impact • Construct a second left turn late at the westbound approach.* * *Note: requires westbound approach widening the ramp widening to accommodate an additional receiving lane* Project applicant shall pay the Project fair share percentage as shown on Table 16 of the Traffic Study (**Appendix H**) toward the cost of these improvements.	Prior to the issuance of the first Building Permit	City of Irwindale Public Works Department	
MM TRA-5 The following improvement at I-605 SB Off-Ramp (SB) at Arrow Highway (EW)	Prior to the issuance of the	City of Irwindale Public	

Mitigation Measure	Timing	Responsible Agency/Monitor	Signature/Date Completed
(Intersection 15) if implemented, would result in less than significant impact • Construct a second left turn lane at the southbound approach* * Note: requires southbound off-ramp widening to accommodate a second left turn lane. Project applicant shall participate in existing fee programs previously established by the City and accepted by Caltrans toward the cost of these improvements.	first Building Permit	Works Department	