PUBLIC REVIEW DRAFT | April 2021

Motor Avenue Industrial Project

FOCUSED ENVIRONMENTAL IMPACT REPORT

SCH No. 2020110167

Prepared For:

City of Azusa

Prepared by:

WILLDAN

PUBLIC REVIEW DRAFT
ENVIRONMENTAL IMPACT REPORT

MOTOR AVENUE INDUSTRIAL PROJECT

SCH No. 2020110167
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April 2021

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1 EXECUTIVE SUMMARY

1.1 Project Location and Setting

The proposed Motor Avenue Industrial Project (project) is located in the City of Azusa (City), Los Angeles County, California, at 411 - 435 S. Motor Avenue on the northwest corner of the intersection of Motor Avenue and Gladstone Avenue (Los Angeles County AIN 8615-002-019, -020). The neighborhood around the project site is dominated by industrial uses, including a pharmaceutical manufacturer on the north, several light industrial manufacturers on the east and south, and the southern Pacific railroad tracks on the west. Immediately west of the railroad tracks lie the Santa Fe Dam Recreation Area and the San Gabriel River Trail. The Cemex-Azusa Quarry and the Azusa Landfill are approximately 1,200' west of the site. The nearest residential neighborhood is approximately 3,200' south of the project site, south of Arrow Highway.

The project site is developed with six vacant industrial buildings of various ages, shapes, and sizes. All buildings are in disrepair and appear to have exceeded their useful life. There is no significant landscaping, and the remainder of the site is paved with deteriorating asphalt. The previous tenant of the property was the Rain Bird Corporation, which utilized the facility for warehousing parts manufactured off-site. The facility had been used for manufacturing irrigation products from the mid-1950s through 2017, and has since been vacant.

Site landscaping and street trees consist of fewer than five ornamental trees (Crape Myrtle, Mexican Fan Palm, Eucalyptus) and low shrubs. None of the trees are California natives, nor are they of significant height or girth. There is no natural, undisturbed vegetation or habitat on the project site.

The site is within the southeastern quadrant of an approximately 30-square-mile region of known groundwater contamination in the San Gabriel Valley, which has been designated by the U.S. Environmental Protection Agency as a National Priority list (NPL) site. Because of the site's location and the known prior uses of the site, a Phase I Environmental Site Assessment (ESA) was performed for the project (Salem Engineering Group, Inc., August 3, 2020, report appended to the project EIR). The 4,764-page report documents the site's usage history from its initial development in the early 1950s, details several cleanup activities performed on the site, and indicates that the underlying site soils are still contaminated with tetrachloroethylene (PCE) and trichloroethylene (TCE) vapors. The project applicant has indicated that a vapor mitigation system will be installed as part of site re-development. Several other site conditions, including the possibility of lead-based paint residue, agricultural chemicals, asbestos-containing materials, and radon may be present and may require remediation.

1.2 Project Description (Summary)

The proposed project would construct a new 97,148 SF, 39'-tall tilt-up concrete warehouse on two adjacent parcels (183,000 SF/4.2 acres). The structure would encompass 3,403 SF of office space and 2,900 SF of covered dock area, incorporating 15 elevated loading docks and one at-grade dock. The project applicant has not specified the warehouse's purpose; however, the most likely use for the warehouse is storage based on the project's layout and parking capacity. 110 parking spaces are distributed around the property, including 5 ADA stalls, 11 vanpool spaces and seven electric-vehicle spaces. Three motorcycle and six bicycle spaces are also proposed.

Landscaping would occupy 9,025 square feet of the property (21.1% of the gross area). The plant palette shows a mixture of various drought-adapted trees, shrubs, and grasses, including several species native to California.

Project development will require demolishing all buildings and paving on the site. None of the structures are considered historically important.

1.3 Project Goals/Objectives

CEQA Guidelines § 15124(b) requires that an EIR project description include "[a] statement of objectives sought by the proposed project….The statement of objectives should include the underlying purpose of the project."

The project's goals and objectives include:

1. Clearing the project site of existing deteriorating structures, paving, and landscaping;
2. Merging parcel numbers AIN 8615-002-019 and 8615-002-020 to create a single parcel;
3. Importing approximately 4,620 cubic yards of fill material to create a building pad at a site elevation of 504 feet above mean sea level;
4. Installing necessary drainage devices to convey stormwater into the City storm drain system;
5. Installing a vapor mitigation system to remove PCE and TCE vapors from the site soils;
6. Conducting additional soil/site remediation to reduce soil contaminants to below regulatory thresholds;
7. Re-developing the project site with a 97,148 square-foot, 39-feet tall, warehouse structure encompassing 3,403 square feet of office space, with sufficient parking, access driveways, and landscaping;
8. Delivering a turn-key storage warehouse to interested buyers, in line with City economic-development goals; and
9. Providing a source of employment for skilled construction and warehouse workers.

1.4 Environmental Issues/Mitigation Summary

The Initial Study performed for the project indicated that the project could result in significant impacts with respect to air quality, transportation/traffic, unknown/undiscovered cultural and/or tribal resources, greenhouse gas emissions, and hazards and hazardous materials. Impacts associated with aesthetics, biological resources, geology/soils, hydrology/water quality, noise, recreation, utilities/service systems, agricultural resources, land use/planning, population/housing, wildfire, energy, mineral resources, and public services were considered to be less than significant. However, comments received in response to the Notice of Preparation and Initial Study revealed that impacts to biological resources could occur, since there is some ornamental vegetation remaining on the project site that could support nesting birds protected under the Migratory Bird Treaty Act. Accordingly, the discussion of on-site ornamental vegetation (biological resources) has been updated in the Initial Study, and appropriate mitigation measures for protection of migratory bird species included. Because the resources on the project site are minimal and no significant impacts remain after mitigation, the Focused EIR does not contain a separate Biological Resources section. Mitigation measures are included in Section 5.1 (Issues Ruled Out In Initial Study). Table PS-1 below summarizes the project's anticipated impacts, standard City conditions of approval which are designed to reduce impacts, additional mitigation measures, and notes whether impacts would remain significant after mitigation. Environmental topics that were ruled out by the Initial Study from further discussion in the Focused EIR are noted.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Aesthetics	Would the project have a substantial effect on a scenic vista?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 25-28.
	Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, pp. 25-28.
	Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	**SCA AES-1:** Concurrent with the Grading Permit Application, a Construction Management Plan shall be submitted for review and approval by the Director of Economic and Community Development. The Construction Management Plan shall, at a minimum, indicate the equipment and vehicle staging areas, stockpiling of materials, fencing (i.e., temporary fencing with opaque material), and haul routes. The designation of construction haul routes would route traffic to avoid residential areas in the City. The requirement for a Construction Management Plan shall be included in Project specifications, subject to verification by the Director of Economic and Community Development prior to final plan approval.	None required.	Less than significant impact – discussed in IS only, pp. 25-28.
	Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	No standard conditions of approval apply. Section 88.31.030 (Outdoor Lighting)	None required.	Less than significant impact – discussed in IS only, pp. 25-28.
Cumulative Impacts	Would the project, combined with other projects in the vicinity, cause a cumulatively substantial effect on a scenic vista?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 25-28.
	Would the project, combined with other projects in the vicinity, substantially damage scenic resources?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, pp. 25-28.
	Would the project, combined with other related cumulative projects, cause a cumulatively considerable degradation of the visual character/quality of the development site and its surroundings?	**SCA AES-1** applies.	None required.	Less than significant impact – discussed in IS only, pp. 25-28.
	Would the project, combined with other related cumulative projects, cumulatively contribute to considerable light/glare impacts?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 25-28.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Agricultural Resources	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, p. 29.
	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only.
	Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only.
Cumulative Impacts	Would the project, combined with other related cumulative projects, affect agricultural resources?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only.

Air Quality	Would the project conflict with or obstruct implementation of the applicable air quality plan?	No standard conditions of approval apply.	**AQ-1** Project plans and bid documents shall specify that all construction equipment shall be equipped with EPA Tier-IV engines or better. "All construction equipment" includes, but is not limited to, air compressors, cement and mortar mixers, concrete industrial saws, cranes, excavators, forklifts, generator sets, graders, pavers, paving equipment, rollers, rubber-tired dozers, tractors, loaders, backhoes, and welders. Equipment shall be field-verified prior to beginning each construction phase by the City Building Official or designee.
			AQ-2 Project plans shall specify "Low-VOC" architectural coatings for all interior and exterior applications, including structural coatings and parking lot striping, which have been formulated to exceed the regulatory VOC limits put forth by South Coast Air Quality Management District (SCAQMD) Rule 1113. Low VOC paints shall contain no more than 50 grams per liter of VOC.
			AQ-3 Project plans shall specify SCAQMD compliance requirements for Rules 401, 402, 403, 404, 405, and 1110.2. Compliance shall be field-verified by the City Building Official at least twice weekly.
			AQ-4 Prior to final occupancy, truck access gates and each loading dock shall be posted with signs containing these directives and information or equivalent, in English and Spanish/Español. Signs shall provide telephone numbers of the building facilities manager, City Code Enforcement, and the California Air Resources Board (CARB) to report violations. Dynamic QR codes may be added to facilitate information transmittal:
			• **Prevent Air Pollution/Prevención de la contaminación atmosférica:**
			  • Turn off truck engines when parked/ Apaga los motores de los camiones cuando esté estacionado.
			  • Do not idle engines for more than 5 minutes/No se des ralentí durante más de 5 minutos.
				Less Than Significant

	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	No standard conditions of approval apply.		Significant and Unavoidable
	Would the project expose sensitive receptors to substantial pollutant concentrations?	No standard conditions of approval apply.		Less Than Significant

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			• Call Building Facility Manager at _____ to report violations/Llama al gerente al _____ para informar de violaciones. • Call City Code Enforcement at (626) 812-5265 if the manager is not available/ Llama a la policía de código de la ciudad si el gerente no está disponible. • Call the South Coast Air Quality Management District at 1-800-CUT-SMOG (288-7664) for assistance with violations/Llama a 1-800-2880-7664 por ayuda con infracciones. **AQ-5** If refrigerated storage is proposed for any portion of the warehouse, the project proponent shall request an amendment to the project's Conditional Use Permit and provide all information necessary for supplemental air quality impact review and appropriate mitigation.	
	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No standard conditions of approval apply.	**AQ-6** Asphalt odor-suppression additives shall be required for all on-site hot-mix asphalt applications. Project engineering specifications shall incorporate additive specifications. This requirement shall be placed in all engineering notes sections on project plans.	Less Than Significant with Mitigation Incorporated.
Cumulative Impacts	Would the project generate air quality impacts that when combined with existing conditions and other new projects in the vicinity would result in impacts that are cumulatively considerable?	No standard conditions of approval apply.	Mitigation measures applied as listed above; related project would be subject to the same SCAQMD Rules and mitigation measures similar to those proposed for the project.	Significant and Unavoidable.
Biological Resources	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No standard conditions of approval apply.	**Bio-1** To prevent take of listed bird species or their nests, or roosting bats, the project proponent shall: a. Prior to obtaining demolition and grading permits, and within two weeks of site construction activities, (demolition, site preparation, grading), the project proponent shall conduct a pre-construction survey to rule out the presence of nesting birds or roosting bats on the subject property. The survey shall be performed by one or more CDFW-certified biological consultants with experience in avian and bat species with potential to be present. Protocol-level surveys are not required. b. If the survey results include evidence that protected species are nesting or roosting on the subject property, its buildings or vegetation, the biological consultant shall prepare a written, comprehensive avoidance/mitigation strategy that shall be carried out by the project proponent. This strategy may include but is not limited to the following measures: 1. Postponing construction until no active nests or roosts are present on the subject property (i.e., fledglings and adults have abandoned all nests; no active roosts are identified);	Less Than Significant with Mitigation Incorporated.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			2. If nests/roosts are discovered, the project proponent shall engage a qualified biological consultant to: i. Obtain any applicable permits from the CDFW and comply with permit requirements; ii. Maintain a 300' buffer zone around any active nests or roosts, indicating the zone with temporary construction fencing and signage; iii. Train construction workers on-site before demolition begins; iv. Monitor the project site twice weekly to gauge nest/roost occupancy status; v. Direct exclusion methods to prevent re-occupation of nests after nest abandonment. vi. Prepare report(s) documenting survey results and follow-up measures to the satisfaction of the City. **3. Demolition and grading permits shall not be granted until the project proponent has demonstrated to the satisfaction of the City that Measures Bio-1(a) and (b) have been performed.** c. If the pre-construction survey does not reveal nesting birds or roosting bats, no additional action is necessary and demolition may proceed provided that it occurs within two weeks of the field survey. **Bio-2** To prevent the take of protected plant species that may be present on-site, the project proponent shall: a. Prior to obtaining grading or demolition permits, and within two weeks of site construction activities, (demolition, site preparation, grading), the project proponent shall conduct a pre-construction survey to rule out the presence of listed plant species on the subject property. The survey shall be performed by one or more CDFW-certified biological consultants with experience in California-native plant species with potential to be present. b. If such plants are discovered on the project site, the project proponent shall direct the biological consultant to seek applicable permits from the CDFW and if required, the U.S. Fish and Wildlife Service (USFW). Permit requirements may include preparing an avoidance or salvage plan, implementing the plan, and conducting follow-up actions as required. Mitigation may include purchase of mitigation credits at a biologically-similar mitigation bank, at the discretion of the CDFW or the USFW. **Demolition or grading permits shall not be issued until applicable permits have been obtained and a compliance method implemented.**	

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			c. If no sensitive plant species are identified on-site, then no further action is required and demolition and grading permits may be granted. **Bio-3** To prevent spread of non-native invasive plant species and to comply with the CalGreen Building Code provisions for drought-adapted plant material, the final project landscape plant palette shall not contain plants listed on the California Invasive Plant Council checklist, available at https://www.cal-ipc.org/wp-content/uploads/2018/05/InvasivePlantChecklistforCaliforniaLandscaping.pdf (accessed March 22, 2021). Prior to approval of final landscape plans, the project proponent shall demonstrate to the City's satisfaction that no known invasive species have been incorporated into the project's plant palette.	
	Would the project have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, pp. 31.
	Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, p. 31.
	Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No standard conditions of approval apply.	Mitigation Measure Bio-1 above applies.	Less than Significant with Mitigation Incorporated.
	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, p. 31.
	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, p. 32.
Cumulative Impacts	Would the project affect biological resources that when combined with existing conditions and other new projects in the vicinity would result in impacts that are cumulatively considerable?	No standard conditions of approval apply.	None required.	Less Than Significant.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Cultural Resources	Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	No standard conditions of approval apply.	None required.	Less Than Significant.
	Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	**SCA CUL-1**: In accordance with Municipal Code Section 88.30.012, if evidence of subsurface cultural resources is found during excavation and other groundbreaking activities, excavation, and other construction activity within 50 feet of the find shall cease and the construction contractor shall contact the City of Azusa Community Development Department. With direction from the Director of Community Development, a Registered Professional Archaeologist approved by the City shall be retained to evaluate the discovery prior to resuming grading in the immediate vicinity of the find. If the discovery is believed to be an important Native American deposit, a Native American representative shall be contacted to allow for their concerns to be addressed. If warranted, the archaeologist shall develop a Research Design and Data Recovery Program to mitigate impacts. Mitigation may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation of the find in a local museum or repository, and preparation of a report summarizing the find.	**Cul-1** Before site grading and/or excavation begins, the project proponent shall engage a Registered Professional Archaeologist (RPA) to conduct an on-site pre-construction training for job site personnel and equipment operators. The City of Azusa building inspector assigned to the project shall attend and document this training. The training may be a "tailgate" training but must be sufficient to inform all workers that undiscovered cultural resources may be present on-site and that conditions of approval intended to protect those resources attach to the project. The RPA shall also train site workers how to recognize cultural resources upon discovery to ensure compliance with the conditions of approval.	Less than Significant with Mitigation Incorporated.
	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**SCA CUL-2:** If evidence of subsurface paleontological resources is found during construction, excavation, and other construction activity within 50 feet of the find shall cease and the construction contractor shall contact the City of Azusa Community Development Department. With direction from the Director of Community Development, a paleontologist certified by the County of Los Angeles shall evaluate the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources. The Paleontological Resources Mitigation Program shall be adopted and implemented by the Applicant.	Mitigation Measure Cul-1 applies.	Less than Significant with Mitigation Incorporated.
	Would the project disturb any human remains, including those interred outside of formal cemeteries?	California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98.	Mitigation Measure Cul-1 applies.	Less than Significant with Mitigation Incorporated.

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		In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner shall notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and shall advise concerning appropriate and dignified treatment of the remains and associated grave goods.		
Cumulative Impacts	Would the Project, combined with other related cumulative projects, cause a cumulatively considerable impact to a historical resource, archaeological resource, paleontological resource, or human remains?	SCA-CUL 1 and 2 apply.	Mitigation Measure Cul-1 applies.	Less than Significant with Mitigation Incorporated.
Energy	Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, p. 34.
	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, p. 34
Cumulative Impacts	Would the project, combined with other related cumulative projects, result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with renewable energy or energy efficiency plans?	No standard conditions of approval apply.	None required.	Less than significant impact.
Geology/Soils	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			
	• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map 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.	No standard conditions of approval apply. California Building Code provisions apply.	None required.	Less than significant impact – discussed in IS only, pp. 35-37

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
	• Strong seismic ground shaking?	**SCA GEO-1**: Prior to issuance of a grading permit, the Project Applicant shall demonstrate, to the satisfaction of the City of Azusa Building Official, that the recommendations for design and construction identified in a Preliminary Geotechnical Study have been incorporated into the Project design, grading plans, and building plans. The project's final grading plans, foundation plans, building loads, and specifications shall be reviewed by a State of California Registered Professional Geologist/Registered Professional Engineer to verify that the Geotechnical Study's recommendations have been incorporated and updated, as needed.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	• Seismic-related ground failure, including liquefaction?	**SCA GEO-2**: Pursuant to the Seismic Hazards Mapping Act, the Project Applicant shall submit a Preliminary Geotechnical Study, to the State Geologist within 30 days after the EIR is certified and the report is approved by the City of Azusa Building Official.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	• Landslides?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	Would the project result in substantial soil erosion or the loss of topsoil?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	SCA GEO-1 and 2 apply.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	Would the project be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 35-37.
	Would the project 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?	No standard conditions of approval apply.	None required.	No impact – discussed in IS only, pp. 35-37.
Cumulative Impacts	Would the project, combined with other projects in the vicinity, result in cumulative impacts related to geology and soils?	SCA GEO-1 and 2 apply.	None required.	Less Than Significant Impact
Greenhouse Gas Emissions	Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No standard conditions of approval apply.	GHG-1 Final landscape plans shall incorporate at least 51 trees, conforming to project conceptual plans. Tree count shall be verified prior to occupancy. GHG-2 Project plans shall specify how the Project's energy efficiencies will meet applicable current California Title 24 (Green Building Code) Energy Efficiency Standards.	Less Than Significant Impact

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			GHG-3 Project plans shall specify high-efficiency LED lighting for interior and exterior lighting applications. GHG-4 To reduce water consumption and associated energy-use, the Project shall be designed to comply with the mandatory reductions in indoor water usage contained in the current California Green Building Code and any mandated reduction in outdoor water usage contained in the City of Azusa's water efficient landscape requirements. Additionally, the Project shall implement the following: • All plant materials shown in the project's landscape plans shall be drought-adapted plant material suitable for Sunset Western Garden Book Zone 21; plants native to and/or compatible with the San Gabriel Valley/foothills shall be emphasized; • Landscape irrigation shall use water-efficient irrigation technology, including rain-sensing shutoff features; • Project plans shall specify light colored "cool" roofing material, and Energy Star-rated heating, cooling, and lighting devices; • Project plans shall specify EPA Certified WaterSense-labeled or equivalent faucets, high-efficiency dual-flush toilets, and water-conserving shower heads (as applicable – if showers are not provided on-site, water-conserving shower heads shall not be required).	
	Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No standard conditions of approval apply.	No feasible mitigation measures apply.	Significant and Unavoidable
Cumulative Impacts	Would the project, combined with other projects in the vicinity, result in cumulative impacts related to greenhouse gas emissions?	No standard conditions of approval apply.	Mitigation Measures GHG-1 through GHG-4 apply. Related projects would be subject to similar mitigation measures.	Significant and Unavoidable
Hazards and Hazardous Materials	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No standard conditions of approval apply.	None required.	Less than significant impact.
	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident considerations involving the release of hazardous materials into the environment?	No standard conditions of approval apply.	**Mitigation Measure Haz-1: Phase II Environmental Site Analysis (ESA).** Prior to issuance of building permits, including grading and demolition permits, the applicant shall conduct a Phase II ESA according to the most current ASTM E 1903 *Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process*, to include but not be limited to VOC levels, asbestos, lead-based paint, and radon. The Phase II ESA and remediation studies and plans shall be completed by an environmental investigator(s) specifically qualified to meet the responsibilities for the issue(s) of concern. Such qualifications shall be listed and explained in the Phase II ESA Report.	Less than Significant with Mitigation Incorporated

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			The applicant shall also implement remediation measures as recommended in the Phase II ESA to the satisfaction of the City Building Division, SCAQMD, and the DTSC and/or the Los Angeles County Fire Department Hazardous Materials Division (depending upon which of the two oversight agencies, the LAFD and the DTSC, assumes oversight responsibility). Remediation measures in the Phase II ESA shall conform to the relevant ASTM Guides and Practices and the California DTSC's current vapor intrusion mitigation advisory document for removing contaminants or reducing site contamination to safe levels (2011 edition is available at *https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/VIMA_Final_Oct_20111.pdf*; 2021 edition is in progress). Such measures may include, but not be limited to: • **Vapor Intrusion Analysis** and subsequent installation of vapor barriers (concrete or geotextile), and/or a vapor intrusion system (required in MM Haz-3 below); • **Operations and Maintenance (O&M) Plan** for managing site contamination and remediation equipment; • **Hard Cap Engineering Controls** (concrete barrier under building slab, vapor extraction system, etc.) and/or institutional controls (restrictive covenants, access restrictions); • **Soil Management Plan**; and • Other measures as recommended by the environmental investigator. **Mitigation Measure Haz-2**: **Soil Management Plan.** Prior to issuance of building permits, including grading and demolition permits, the applicant shall prepare and implement a Soil Management Plan to the satisfaction of the City Building Division, SCAQMD, and the DTSC/LAFD. The Soil Management Plan shall include but not be limited to: • A site-specific construction health and safety plan that addresses the potential hazards from exposure to on-site contaminants, including a schedule for on-site training meetings, field auditing, requirements for personal protective equipment (PPE), and training and assigning a field safety officer to supervise and enforce compliance; • Designation of contaminated soil perimeters as identified in the Phase II ESA; • Requirements for grading and stockpiling potentially-contaminated soil; • Requirements for testing and disposal of contaminated soil; • Sampling strategies for determining when contamination is no longer present in site soils that could be encountered by construction workers or warehouse personnel; • Backfilling protocols, including safety requirements for fill soil; • A list of contact information, including direct telephone numbers to individuals, agencies and businesses associated with the project, particularly the environmental professional, the site foreman, the construction manager, excavation contractor, etc.	

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			A paper copy of the Soil Management Plan shall be retained on-site through project construction. **Mitigation Measure Haz-3**: **Vapor Intrusion (VI) Mitigation System.** Prior to issuance of building permits, including grading and demolition permits, the applicant shall submit engineered plans showing a vapor intrusion mitigation system to reduce baseline indoor VOC vapor fractions to levels at least 10% below regulatory minimums. The system shall conform to the most recent DTSC Vapor Intrusion Mitigation Advisory documentation (2011 Advisory available here: *https://dtsc.ca.gov/wpcontent/uploads/sites/31/2016/01/VIMA_Final_Oct_20111.pdf*, accessed March 17, 2021). The City Building Official shall not issue a building permit until the system's estimated performance is validated by a registered professional engineer or environmental specialist with specific expertise in such systems, and the system is approved by the responsible agency (LAFD or DTSC). The City Building Official shall not issue an occupancy permit until the responsible agency has confirmed in writing that the system has been tested by the above-referenced professional, is functioning as designed, and has reduced interior vapor levels to 10% or more below regulatory minimums. The VI system shall include appropriate indoor gas-monitoring devices with alarms that sound if VOC concentrations rise to regulatory minimums. Components of the system shall include but not be limited to: • Operations and Maintenance (O&M) Plan; • Reporting Plan (for reporting to DTSC or the LAFD, depending on which agency assumes oversight); • Inspections at frequency recommended by DTSC or LAFD; • **Enforceable Mechanism:** the site owner/operator shall enter into an enforceable mechanism to address DTSC or LAFD oversight and cost recovery, e.g., a corrective action consent agreement, consent order, consent agreement, voluntary cleanup agreement, and an O&M agreement; • **Financial Assurance:** The responsible party or site owner/operator shall establish and maintain a financial assurance mechanism for costs associated with implementation of the VI mitigation response action, O&M activities, land use covenant (LUC) compliance, five-year reviews, and DTSC/LAFD oversight; • **Access Agreement:** The site owner/operator shall permit access at any time to DTSC/LAFD personnel for inspection and monitoring. • **Institutional Control:** Prior to building occupancy, the responsible party (current site owner) shall record with the Los Angeles County Registrar/Recorder a Land Use Covenant to Restrict Use of Property, Environmental Restriction (LUC) with prescribed notifications, prohibitions, and engineering controls to ensure O&M and disclosure to future buyers and occupants. The LUC shall also contain a requirement to perform a Five-Year-Review if hazardous substances remain at the site above levels that would preclude unrestricted land use. The purpose	

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
			of the five-year review is to ensure that the response action 1) remains protective of human health and the environment, 2) is functioning as designed, and 3) is maintained with appropriate O&M activities; • **Termination of Building Controls**. Subsurface remediation efforts will eventually reduce volatile chemical concentrations in soil, soil gas, and/or groundwater to levels that no longer require mitigation. At this point, the VI mitigation system may be shut down and/or removed and O&M requirements will cease. The implementation plan for the VI mitigation system shall include specific provisions for determining that subsurface remediation is complete and that the VI mitigation system is no longer needed. A confirmation sampling and analysis plan for soil, soil gas, and/or groundwater shall be submitted to the City and LAFD/DTSC. The City Building Official shall not issue a building permit until the system's estimated performance is validated by a registered professional engineer or environmental specialist with specific expertise in such systems, and the system is approved by the responsible agency (LAFD or DTSC).	
	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?	No standard conditions of approval apply.	None required.	Less than significant impact.
	Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No standard conditions of approval apply.	None required.	No Impact.
	For a project located within 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 result in a safety hazard for people residing or working in the project area?	No standard conditions of approval apply.	None required.	No Impact.
	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No standard conditions of approval apply.	None required.	Less than significant impact.
	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No standard conditions of approval apply.	None required.	Less Than Significant Impact.
Cumulative Impacts	Would the project, when combined with other projects in the vicinity, result in cumulative impacts related to hazards and/or hazardous materials?	No standard conditions of approval apply.	None required in addition to Haz-1 through Haz-3.	Less Than Significant Impact with Mitigation Incorporated.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Hydrology/Water Quality	Would the project violate any water quality standards or waste discharge requirements?	No standard conditions of approval apply. AMC 60 requires stormwater pollution prevention plans and best management practices (BMPs) for construction and operation.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	No standard conditions of approval apply. Project plans include grading and drainage plans subject to City approval.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project 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?	No standard conditions of approval apply. Project plans include grading and drainage plans subject to City approval.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project otherwise substantially degrade water quality?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.
	Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 39-41.
	Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 39-41.
	Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS only, pp. 39-41.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
	Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 39-41.
Cumulative Impacts	Would the project, when combined with other projects in the vicinity, result in cumulative impacts related to hydrology and/or water quality?	Compliance with AMC § 60 required for all similar projects.	None required.	Less than significant impact.
Land Use/Planning	Would the project physically divide an established community?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 42.
	Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	**SCA LU-1** The Applicant shall identify on the Landscape Concept Plan features (e.g., wayfinding signage and pedestrian crossing pavers or stamped concrete, etc.) that encourage pedestrian and landscape linkages to other areas and businesses, as appropriate.	None required.	No impact – discussed in IS, p. 42.
	Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 42.
Cumulative Impacts	Would the project, combined with other projects in the vicinity, cumulatively conflict with applicable land use plans or habitat conservation plans, or cumulatively divide an established community?	No standard conditions of approval apply.	None required.	No impact.
Mineral Resources	Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 43
	Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 43
Cumulative Impacts	Would the project, combined with other projects in the vicinity, result in cumulative loss of availability of mineral resources?	No standard conditions of approval apply.	None required.	No impact.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Noise	Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	**SCA NOI-1** Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday, unless otherwise allowed through conditions of approval (AMC § 88.31.020(C)(3)). The Project construction supervisor shall ensure compliance with the note and the City shall conduct periodic inspection at its discretion. **SCA NOI-2** During all Site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the site. **SCA NOI-3** The construction contractor shall locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Site during all Project construction (i.e., to the center).	None required.	Less than significant impact – discussed in IS, pp. 44-45.
	Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 44-45.
	Would the project result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 44-45.
	Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 44-45.
	For a project located within 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?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 44-45
	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 44-45

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Cumulative Impacts	Would the project, combined with other projects, expose people to cumulative increases in ambient noise?	SCA NOI-1-3 apply.	None required.	Less than significant impact.
Population/Housing	Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 45-46
	Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 44-45
	Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, pp. 44-45
Cumulative Impacts	Would the project result in cumulative increase in population growth, cumulative displacement of housing or persons?	No standard conditions of approval apply.	None required.	No impact.
Public Services	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
	• Fire protection?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 46-47
	• Police protection?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 46-47
	• Schools?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 46-47
	• Parks?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 46-47
	• Other public facilities?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, pp. 46-47
Cumulative Impacts				
Recreation	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, p. 48.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, p. 48.
Cumulative Impacts	Would the project, combined with other similar projects in the vicinity, result in cumulative impacts to recreational facilities or cumulative causing adverse physical effects on the environment related to recreational facilities?	No standard conditions of approval apply.	None required.	Less than significant impact.
Transportation/Traffic	Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	**SCA TRA-1** Prior to issuance of any grading and/or demolition permits, whichever occurs first, a Construction Management Plan shall be submitted for review and approval by the City Engineer. The requirement for a Construction Management Plan shall be incorporated into the Project specifications and subject to verification by the City Engineer prior to final plan approval. The Construction Management Plan shall, at a minimum, address the following: • Traffic control for any street closure, detour, or other disruption to traffic circulation. • Identify construction vehicles haul routes for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.) to access the Site; necessary traffic controls and detours; and a construction phasing plan for the Project. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Require the Contractor to keep all haul routes clean and free of debris, including but not limited, to gravel and dirt as a result of its operations. The Contractor shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. • Hauling or transport of oversize loads shall be allowed between the hours of 9:00 a.m. and 3:00 p.m. only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends, or Federal holidays.	None required.	Less than significant impact – discussed in IS, p. 49.
	Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) (Criteria for Analyzing Transportation Impacts)?	No standard conditions of approval apply.	No feasible mitigation measures apply.	Significant and unavoidable impact.
	Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 49.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No standard conditions of approval apply.	None required.	No impact – discussed in IS, p. 49.
	Would the project result in inadequate emergency access?	No standard conditions of approval apply.	None required.	Less than significant impact – discussed in IS, p. 49.
Cumulative Impacts	Would the project, when combined with other similar projects in the vicinity, result in cumulative program conflicts, increases in vehicle miles traveled, or other transportation-related issues?	No standard conditions of approval apply.	No feasible mitigation measures apply.	Significant and unavoidable impact.
Tribal Cultural Resources	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
	• Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	**SCA-CUL-1** applies (see Cultural Resources, above).	Mitigation measures proposed in the Initial Study are already required by the Standard Conditions of Approval and existing law. Additional measures may be undertaken separately from this EIR that result from Tribal Consultation efforts.	Less than significant; discussed in IS p. 50.
	• A resource determined by the lead agency, in its direction 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.	**SCA-CUL-1** applies (see Cultural Resources, above).	Mitigation measures proposed in the Initial Study are already required by the Standard Conditions of Approval and existing law. Additional measures may be undertaken separately from this EIR that result from Tribal Consultation efforts.	Less than significant; discussed in IS p. 50.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
Utilities/Service Systems	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No standard conditions of approval apply.	None required.	Less than significant; discussed in IS p. 51.
	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No standard conditions of approval apply.	None required.	Less than significant; discussed in IS p. 51.
	Would the project 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?	No standard conditions of approval apply.	None required.	No impact.
	Would the project 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?	No standard conditions of approval apply.	None required.	Less than significant; discussed in IS p. 51.
	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No standard conditions of approval apply.	None required.	Less than significant; discussed in IS p. 51.
Wildfire	Would the project, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, impair an adopted emergency response plan or emergency evacuation plan?	No standard conditions of approval apply.	None required.	Less than significant.
	Would the project, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?	No standard conditions of approval apply.	None required.	Less than significant.

Environmental Topic/ EIR Section	Thresholds of Significance	Standard Conditions of Approval (SCA); Azusa Municipal Code (AMC) Requirements	Mitigation Measures (MM)	Significance After Mitigation
	Would the project, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?	No standard conditions of approval apply.	None required.	Less than significant.
	Would the project, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?	No standard conditions of approval apply.	None required.	Less than significant.

1.5 Significant and Unavoidable Impacts

The proposed warehouse project would generate significant and unavoidable levels of air pollutants and vehicle-miles-traveled (see Sections 5.2 and 5.5). Mitigation measures to reduce air quality impacts are required, but are not sufficient to reduce the project's cumulative contribution to the region's pollutant load to less than significant, in light of current non-attainment conditions for particulate matter and ozone. Mitigation measures to reduce vehicle miles traveled to less than significant, such as instituting ride-share programs or shuttles to transit, are not in the City's control or ability to fund or enforce.

1.6 Summary of Project Alternatives

Project Alternatives include No Project, Smaller Warehouse, and Business Park.

- **No Project Alternative.** This alternative would result in no changes to the subject property. The existing buildings would remain on site until another by-right or discretionary development proposal is submitted, a demolition permit is granted in the absence of a discretionary entitlement request. If the structures are re-occupied, uses must conform to those listed in the City of Azusa Development Code for the zone unless subsequent discretionary approvals are obtained.
- **Smaller Warehouse.** This alternative would construct a warehouse with less capacity than the one proposed. Air quality and greenhouse gas emission impacts would be lessened proportionately, but because particulate matter and ozone-precursor emissions would still be generated in a region that is in non-attainment for both pollutants, any increase must still be considered cumulatively significant and unavoidable. A smaller project would require fewer employees, and potentially fewer vehicle *trips*. Overall *vehicle miles traveled* (VMT) might be reduced, but because VMT are calculated on a per-capita basis and vehicle trips would most likely still occur in single-passenger vehicles, no meaningful reduction in VMT would occur. Impacts associated with hazards and hazardous materials would not change, and would be mitigated to less than significant levels by the same mitigation measures as have been drafted for the proposed project.
- **Business Park.** This alternative would construct a small "business park" of individual building units, used for light manufacturing, R&D, offices, or non-medical professional services. Operational air quality and greenhouse gas emission impacts would potentially be greater because such uses typically employ more workers who would in turn generate more vehicle trips. As with the proposed project, particulate matter and ozone-precursor emissions would still be generated in a region that is in non-attainment for both pollutants, and result in significant and unavoidable cumulative impacts. Overall vehicle miles traveled (VMT) would likely increase with the greater worker numbers, in the absence of improvements in local transit availability and frequency. Impacts associated with hazards and hazardous materials would not change, and would be mitigated to less than significant levels by the same mitigation measures as have been drafted for the proposed project.

2.0 Introduction and Purpose

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2 Introduction and Purpose

The proposed Motor Avenue Industrial Project (Project) is located within the City of Azusa (City), in the eastern portion of Los Angeles County, approximately 27 miles northeast of downtown Los Angeles. The project site is located at the former Rainbird Inc. property at 411-435 South Motor Avenue, one parcel north of the intersection of Motor Avenue and Gladstone Avenue (AINs 8615-002-019, 20). Refer to Section 3.0, Project Description, for an expanded discussion.

2.1 Purpose of the Focused EIR

The City of Azusa is the Lead Agency under the California Environmental Quality Act (CEQA), and has determined that a Focused Environmental Impact Report (EIR) is required for the Motor Avenue Industrial Project (Project) (State Clearinghouse No. 2020110167). This EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] §21000 *et seq*.), CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.), and the rules, regulations, and procedures for CEQA implementation, as adopted by the City of Azusa. The principal CEQA Guidelines sections governing the content of this document include §§ 15120 – 15132 (Contents of Environmental Impact Reports), §15161 (Project EIR), and §15178(c)(Focused EIR).

CEQA Guidelines §15121 states that:

a. An EIR is an *informational document* (emphasis added) which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.
b. While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under §15091 and if necessary, by making a statement of overriding consideration under §15093.
c. The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.

CEQA Guidelines §15178(c) state that a lead agency shall prepare a "focused" EIR for a project that is identified in a "Master" EIR – here, the General Plan EIR that evaluated the project area for industrial uses – that may have a significant effect on the environment, and a mitigated negative declaration cannot be prepared. Section 11 of the Initial Study demonstrates that the proposed warehouse project is consistent with both the General Plan industrial designations and zoning for the project site.

The focused EIR must "incorporate by reference the master EIR and analyze only the subsequent project's additional significant environmental effects and any new or additional mitigation measures or alternatives that were not identified and analyzed by the Master EIR" (§15178(c)(1)).

Section 15178(c)(2) states:

> A focused EIR need not examine those effects which the lead agency, prior to public release of the focused EIR, finds, on the basis of the initial study, related documents, and commitments

from the proponent of a subsequent project, have been mitigated in one of the following manners:

(A) Mitigated or avoided as a result of mitigation measures identified in the Master EIR which the lead agency will require as part of the approval of the subsequent project;

(B) Examined at a sufficient level of detail in the Master EIR to enable those significant effects to be mitigated or avoided by specific revisions to the project, the imposition of conditions of approval, or by other means in connection with approval of the subsequent project; or

(C) The mitigation or avoidance of which is the responsibility of and within the jurisdiction of another public agency and is, or can and should be, undertaken by that agency.

The Notice of Preparation and Initial Study prepared for this project indicated that at least one environmental effect could not be mitigated to below the City's significance threshold, but that most "impacts" would either be mitigated through existing General Plan measures or regulations, and as such would not be discussed further in this focused EIR. The Initial Study Section 11, Land Use and Planning, demonstrates that the proposed warehouse project is consistent with both the General Plan industrial designations and zoning for the project site. Section 3.5 below lists the requested discretionary actions for the project.

This EIR reviews the existing environmental conditions, analyzes potential impacts with respect to transportation and circulation, hazards and hazardous materials, air quality and greenhouse gas emissions, and identifies feasible mitigation measures to avoid or lessen the Project's potentially significant effects. The mitigation measures that are specified shall be adopted as conditions of approval to minimize the significance of impacts resulting from the Project, and shall be incorporated into the mitigation and monitoring program for the Project.

The City (which has the principal responsibility of processing and approving the Project) and other public (i.e., responsible and trustee) agencies that may use this EIR in the decision-making or permit process will consider the information in this EIR, along with other information that may be presented during the CEQA process. Environmental impacts are not always mitigatable to a level considered less than significant; in those cases, impacts are considered significant unavoidable impacts. In accordance with CEQA Guidelines §15093(b), if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. CEQA Guidelines §15093 requires a "statement of overriding considerations" where the Agency specifies the findings and public benefits for the project that outweigh the impact.

2.2 Compliance with CEQA

Public Review of the Draft EIR

In accordance with CEQA Guidelines §§ 15087 and 15105, this Draft EIR will be circulated for a 45-day public review period, beginning on April 29, 2021. Interested agencies and members of the public are invited to comment in writing on the information contained in this document. Persons and agencies commenting are encouraged to provide information that they believe has not been addressed in the

Draft EIR and to identify where the information can be obtained. All comment letters received before the close of the public review period will be responded to in writing, and the comment letters, together with the responses to those comments, will be included in the Final EIR.

Comment letters/emails should be sent to:

City of Azusa
213 E. Foothill Blvd.
Azusa, CA 91702
Attn: Mr. Dean Flores
dflores@ci.azusa.ca.us

Final EIR Certification

Pursuant to CEQA Guidelines § 15132, *Contents of Final Environmental Impact Report*, the Final EIR will consist of:

a) The Draft EIR or a revision of the Draft;
b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
e) Any other information added by the Lead Agency.

Additionally, pursuant to CEQA Guidelines § 15088, *Evaluation of and Response to Comments*, after the Final EIR is completed, and at least ten days prior to the certification hearing, a copy of the responses to comments made by public agencies on the Draft EIR will be provided to them.

Project Consideration

After Final EIR certification, the City of Azusa Planning Commission may consider approval of the Project. A decision to approve the Project would be accompanied by specific, written findings, in accordance with CEQA Guidelines § 15091, and if required, a specific written statement of overriding considerations, in accordance with CEQA Guidelines § 15093.

2.3 Notice of Preparation

In compliance with the CEQA Guidelines § 15082, as amended, the City has provided opportunities for various agencies and the public to participate in the environmental review process. During Draft EIR preparation, efforts were made to contact various Federal, State, regional, and local government agencies, and other interested parties to solicit comments on the scope of the review in this document. This included the distribution of a Notice of Preparation (NOP) to various responsible agencies, trustee agencies, and interested parties. Pursuant to CEQA Guidelines Section 15082, as amended, and State Clearinghouse Office of Planning and Research (OPR) directives, the City uploaded the NOP and Initial

Study to the OPR CEQAnet database and distributed the NOP and Initial Study to members of the public who had requested such notice. The NOP was circulated for a 30-day public review period between November 6, 2020, and December 5, 2020. The purpose of the NOP was to formally announce the preparation of a Draft EIR for the Project, and that, as the Lead Agency, the City was soliciting input regarding the scope and content of the environmental information to be included in the EIR.

The NOP and Initial Study provided preliminary information regarding the anticipated range of impacts to be analyzed within the EIR, and showed how particular environmental subject areas were ruled out

Notice of Preparation

To: OPR State Clearinghouse
1400 Tenth St
Sacramento, CA 95814

From: City of Azusa
231 E. Foothill Ave.
Azusa, CA 91702

Subject: Notice of Preparation of a Draft Environmental Impact Report

The City of Azusa will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study ☒ is ☐ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Dean Flores, Assistant Planner, at the address shown above. We will need the name for a contact person in your agency.

Project Title: **Motor Avenue Industrial Project**

Project Applicant: **Rexford Industrial Realty, Inc.**

Date: **November 6, 2020**

Signature: Dean Flores
Title: Assistant Planner
Telephone: (626) 812-5017

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

for further study. The NOP and NOP comments are provided as Appendices 11.1 and 11.2, Notice of Preparation and Initial Study and Comment Letters, and have been addressed in each appropriate topical area of this EIR. The NOP comments are summarized below:

1. Letter from Ms. Miya Edmonson, IGR/CEQA Branch Chief, California Department of Transportation (Caltrans) to Mr. Dean Flores, City of Azusa, December 2, 2020. Ms. Edmonson requested that the EIR follow current CEQA VMT transportation analysis, that the project incorporate multi-modal and complete streets transportation elements, and that transportation concerns such as reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions be addressed.
2. Letter from Mr. Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, to Mr. Dean Flores, City of Azusa, November 10, 2020. Mr. Green listed the City's responsibilities under Assembly Bill 52 and recommended consultation with California Native American tribes that are traditionally and culturally affiliated with the project area. Mr. Green further noted the requirements for cultural resource studies if such were required by the City for the project. Finally, Mr. Green advised that the lack of surface resources does not preclude their existence below the surface, and that lead agencies should include provisions for avoiding or properly and respectfully dealing with artifacts or human remains.
3. Letter from Ms. Erinn Wilson-Olgin, Environmental Program Manager I, South Coast Region, California Department of Fish and Wildlife to Mr. Dean Flores, City of Azusa, December 8, 2020. Ms. Wilson-Olgin's letter summarizes the CDFW's role as a trustee agency with jurisdiction over California's fish, wildlife, native plants, and habitat. Project-specific recommendations include measures to avoid nesting birds or roosting bats that may nest or roost on-site. The letter also contains extensive discussion of measures that are suitable for "greenfield" development projects that disturb previously undeveloped land.
4. Letter from Ms. Stacey Oborne, Lozeau-Drury LLP, representing Supporters Alliance for Environmental Responsibility ("SAFER"), to Mr. Dean Flores, City of Azusa, November 17, 2020. Ms. Oborne's letter requests that the City provide notices of all project-related CEQA documents, meetings, hearings, and City actions on the project and CEQA documentation. The letter does not comment on substantive issues in the Initial Study.

2.4 EIR Format

The Draft EIR is organized into the following sections:

- **Section 1.0, *Executive Summary***, provides a brief project description and summary of environmental impacts and mitigation measures.
- **Section 2.0, *Introduction and Purpose*,** provides CEQA compliance information and describes the EIR organization.
- **Section 3.0, *Project Description*,** describes the project objectives, characteristics, location, site background and history, and the discretionary actions required to approve the project.
- **Section 4.0, *Cumulative Analysis Factors*,** describes the approach to the project's cumulative environmental effects.
- **Section 5.0, *Environmental Analysis***, contains a detailed environmental analysis of the existing conditions, existing regulatory setting, potential project impacts for two development options, potential cumulative impacts, recommended mitigation measures, and significant unavoidable impacts (if any) for the following environmental topic areas:
    - Air Quality
    - Greenhouse Gas Emissions
    - Hazards and Hazardous Materials
    - Transportation and Circulation

    Issues that were discussed and ruled out for further analysis in the Initial Study are summarized, and issues requiring mitigation but not further discussion are outlined in Section 5.1.
- ***Section 6.0, Other CEQA Considerations***, discusses the project's long-term implications, including any irreversible environmental changes that the project would cause, growth-inducing impacts, and energy conservation.
- ***Section 7.0, Alternatives to the Proposed Project,*** describes a reasonable range of alternatives to the project that could avoid or substantially lessen the project's significant impact and still feasibly attain the basic project objectives. The environmentally-superior project is identified.
- ***Section 8.0: Organizations and Persons Consulted,*** identifies all Federal, State, and local agencies, other organizations, and individuals consulted.
- ***Section 9.0, Appendices,*** lists the technical documentation prepared for this EIR.

2.5 Responsible and Trustee Agencies

Certain projects or actions undertaken by a Lead Agency require subsequent oversight, approvals, or permits from other public entities – "Responsible" and "Trustee" Agencies. CEQA Guidelines §§ 15381 and 15386, as amended, define Responsible Agencies and Trustee Agencies as:

- "Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration.

Responsible Agencies include all public agencies other than the Lead Agency, such as the South Coast Air Quality Management District, which have discretionary approval power over some aspect of the project.

- "Trustee Agency" means a State agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. Trustee Agencies include the California Department of Fish and Wildlife, the State Lands Commission; the State Department of Parks and Recreation and the University of California with regard to sites within the Natural Land and Water Reserves System.

Responsible and Trustee Agencies and other entities that may use this EIR in their decision-making process or for informational purposes include, but may not be limited to, the following:

- South Coast Air Quality Management District;
- Azusa Light and Water Department;
- Los Angeles Regional Water Quality Control Board;
- Department of Conservation;
- Department of Toxic Substances Control; and
- Los Angeles County Fire Department.

2.6 Incorporation by Reference

The following reports and technical studies are incorporated by reference into this EIR. They are located on the City of Azusa website or are available on request from the City of Azusa Planning Department (address and URL above).

1. City of Azusa, *General Plan* (2005)
2. City of Azusa, *General Plan Final Environmental Impact Report* (November 2003)
3. City of Azusa, *Local Hazard Mitigation Plan* (LHMP) (October 21, 2019)
4. Fehr & Peers, *Memorandum to Dean Flores and Manuel Múñoz, Azusa Rexford Industrial Project: Vehicle Miles Traveled Analysis* (February 11, 2021).
5. Salem Engineering, *Final AAI Phase I Environmental Site Assessment, Proposed Industrial Building, 411-435 South Motor Avenue, Azusa, California* (August 3, 2020).
6. Willdan Engineering, *Motor Avenue Industrial Project, Azusa, California, CEQA Initial* Study (November 2020).
7. Willdan Engineering, Memorandum to Salvador Lopez from Joanne Itagaki, *City of Azusa, 415-435 S. Motor Avenue Trip Generation VMT Analysis* (July 8, 2020).

3.0 Project Description

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3 Project Description

3.1 Project Location, General Plan Designation, Zoning, and Setting

Location. The proposed Motor Avenue Industrial Project (Project) is located in the southern portion of the West End Industrial Districts within the City of Azusa (City), Los Angeles County, California, at 411 - 435 S. Motor Avenue on the northwest corner of the intersection of Motor Avenue and Gladstone Avenue (Los Angeles County AIN 8615-002-019, -020). The neighborhood around the project site is dominated by industrial uses, including a pharmaceutical manufacturer on the north, several light industrial manufacturers on the east and south, and the southern Pacific railroad tracks on the west. Immediately west of the railroad tracks lie the Santa Fe Dam Recreation Area and the San Gabriel River Trail. The Cemex-Azusa Quarry is approximately 800' west and west-northwest of the site.

General Plan and Zoning. The General Plan designation for the subject property is "Industrial" and the zoning of the subject property and surrounding properties is "West End Industrial District (DW)." The Azusa Municipal Code, Chapter 88.24.005, Allowable Uses in Districts, Table 2-2, lists permitted uses in the DW zone: laboratories; light and medium intensity manufacturing; media production, reverse-vending machine recycling operations; art/dance/music/martial arts studios; emergency shelters; cottage food home occupations; restaurants; retail warehouses; accessory offices; catering services; equipment rental; maintenance services; personal services; minor and major vehicle repair and body work; and broadcasting studios; more intensive uses are permitted subject to minor or major use permits. Table 2-2 does not expressly list "warehouse" or "storage warehouse;" however, § 88.20.040(A)(3) – *Allowable Land Uses and Planning Permit Requirements – Similar and Compatible Use May be Allowed*, gives the City Zoning Administrator some discretion to permit similar uses provided that six written findings can be made:

1) The characteristics of, and activities associated with the use are similar to one or more of the listed uses, and will not involve greater impacts than the uses listed in the district;
2) The use will be consistent with the purposes of the applicable zoning district;
3) The use will be consistent with the general plan and any applicable specific plan;
4) The use will be compatible with the other uses allowed in the district;
5) The use is not listed as allowable in another zoning district.
6) The use is not similar to a use otherwise not allowed in the zoning district.

Setting. The project site is developed with six vacant industrial buildings of various ages, shapes, and sizes. All buildings are in disrepair and appear to have exceeded their useful life. There is no significant landscaping, and the remainder of the site is paved with deteriorating asphalt. The previous tenant of the property was the Rain Bird Corporation, which used the facility for warehousing parts manufactured off-site. The facility had been used for manufacturing irrigation products from the mid-1950s through 2017.

Site landscaping and street trees consist of various ornamental trees (six Crape Myrtle street trees, Mexican Fan Palm, three Eucalyptus sp.) and low shrubs. None of the trees are California natives, nor are they of significant height or girth. There is no natural, undisturbed vegetation or habitat on the project site.

The site is within the southeastern quadrant of an approximately 30-square-mile region of known groundwater contamination in the San Gabriel Valley, which has been designated by the U.S. Environmental Protection Agency as a National Priority list (NPL) site. Because of the site's location and the known prior uses of the site, a Phase I Environmental Site Assessment (ESA) was performed for the project (Salem Engineering Group, Inc., August 3, 2020, report appended to the project EIR). The report documents the site's usage history from its initial development in the early 1950s, details several cleanup activities performed on the site, and indicates that the underlying site soils are still contaminated with tetrachloroethylene (PCE) and trichloroethylene (TCE) vapors. The project applicant has indicated that a vapor mitigation system will be installed as part of site re-development. Several other site conditions, including the possibility of lead-based paint residue, agricultural chemicals, asbestos-containing materials, radon, and mold may be present and may require remediation.

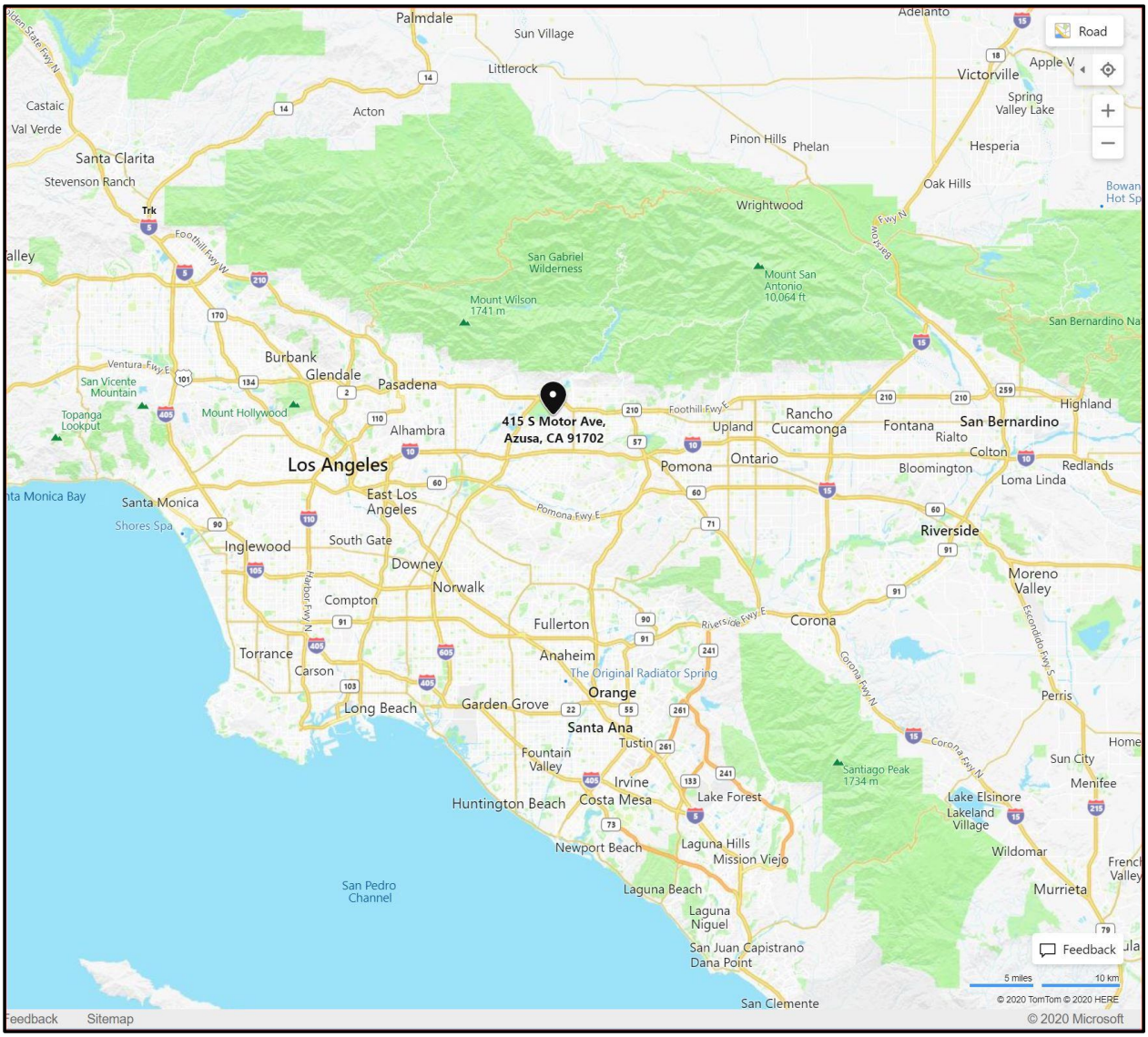

Figure 1 Regional Vicinity

Source: Bing Maps, Microsoft Corporation https://www.bing.com/maps/

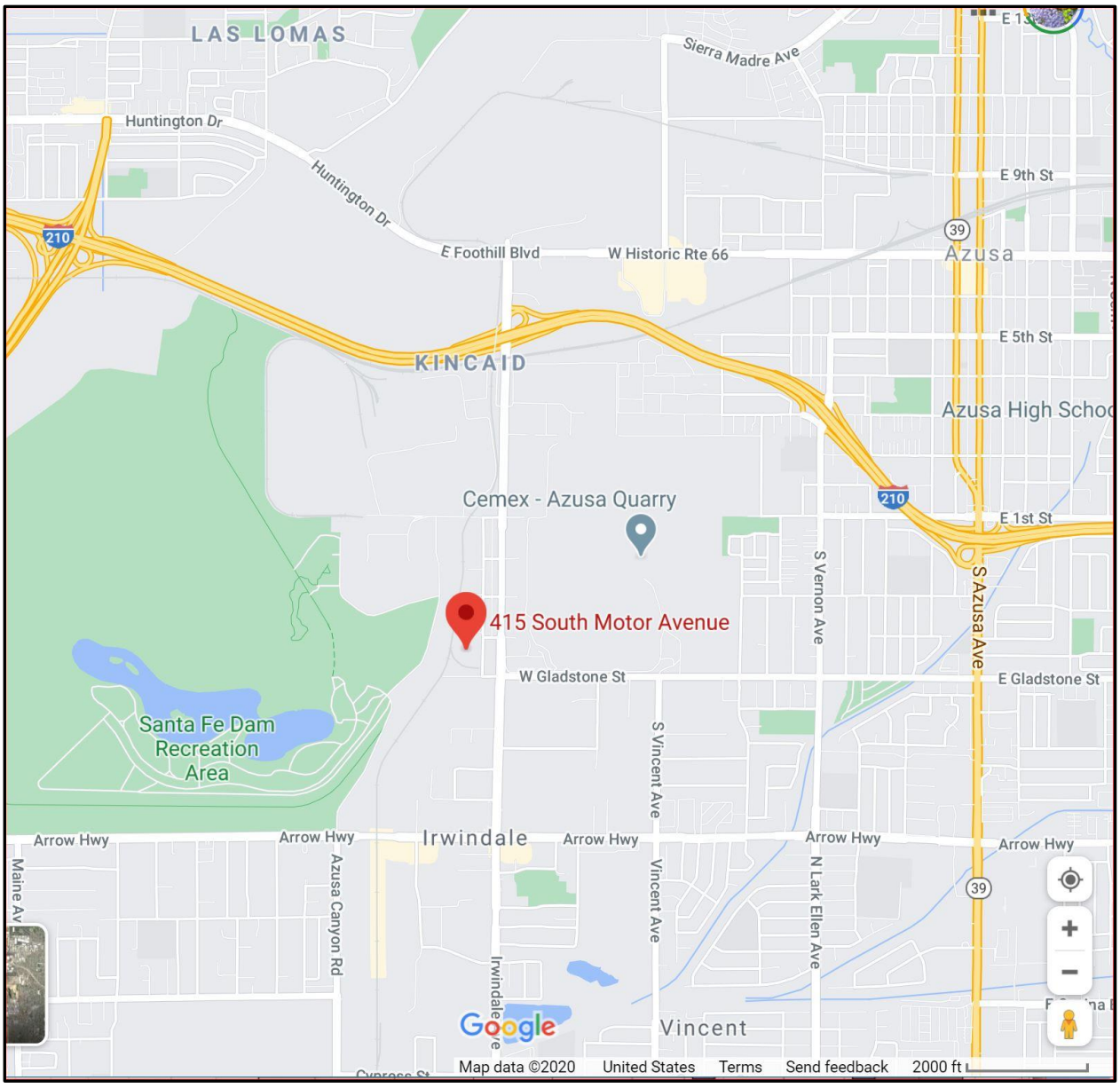

Figure 2 Project Vicinity

source: Google Maps, https://www.google.com/maps/place/415+S+Motor+Ave,+Azusa,+CA+91702/@34.1155527,-117.9380013,17z/data=!4m13!1m7!3m6!1s0x80c2d80fce3261fd:0xad4365ac0aa9cf20!2s415+S+Motor+Ave,+Azusa,+CA+91702!3b1!8m2!3d34.115553!4d-117.935834!3m4!1s0x80c2d80fce3261fd:0xad4365ac0aa9cf20!8m2!3d34.115553!4d-117.935834

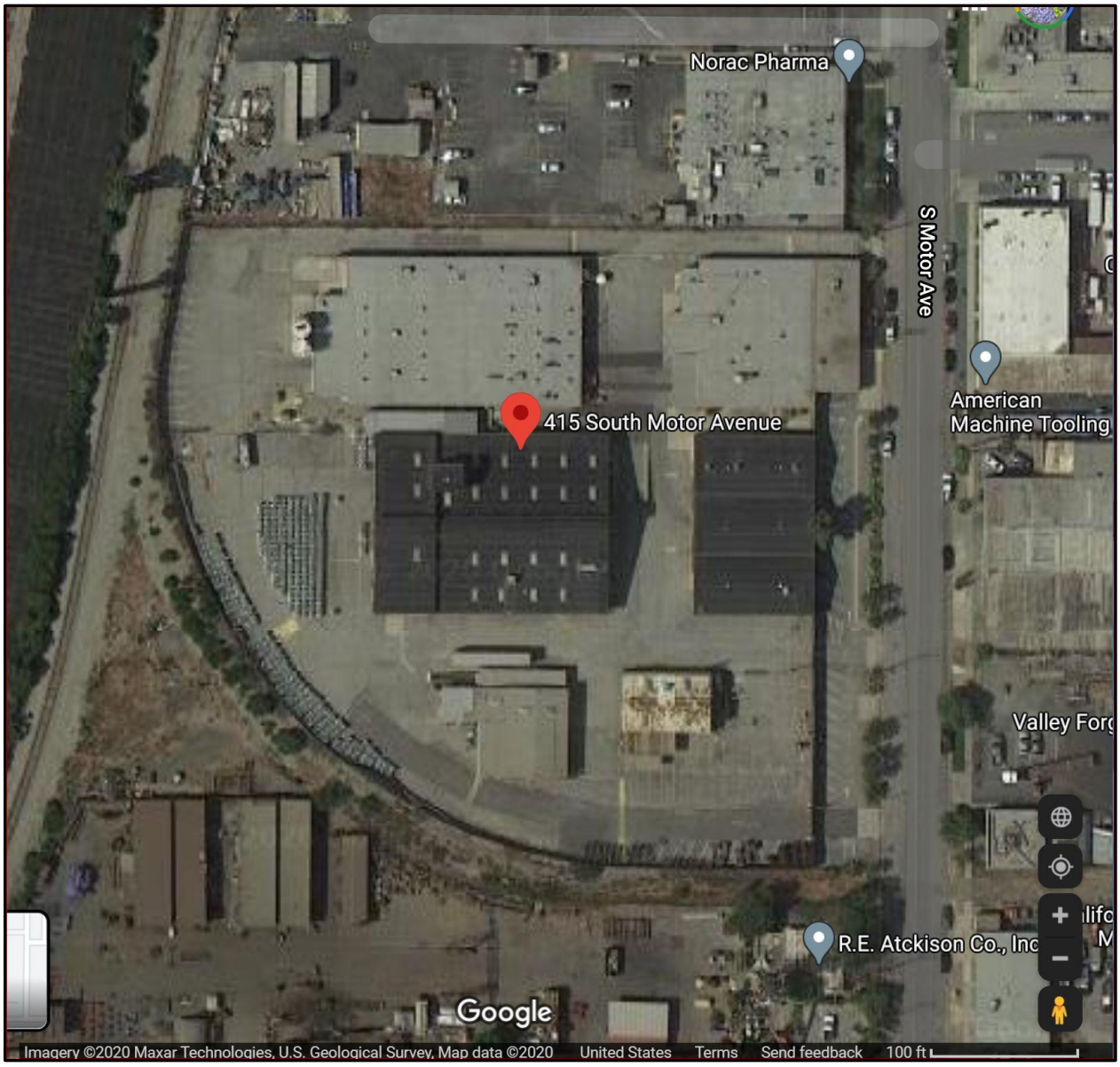

Figure 3 Aerial View

source: see Figure 2 above

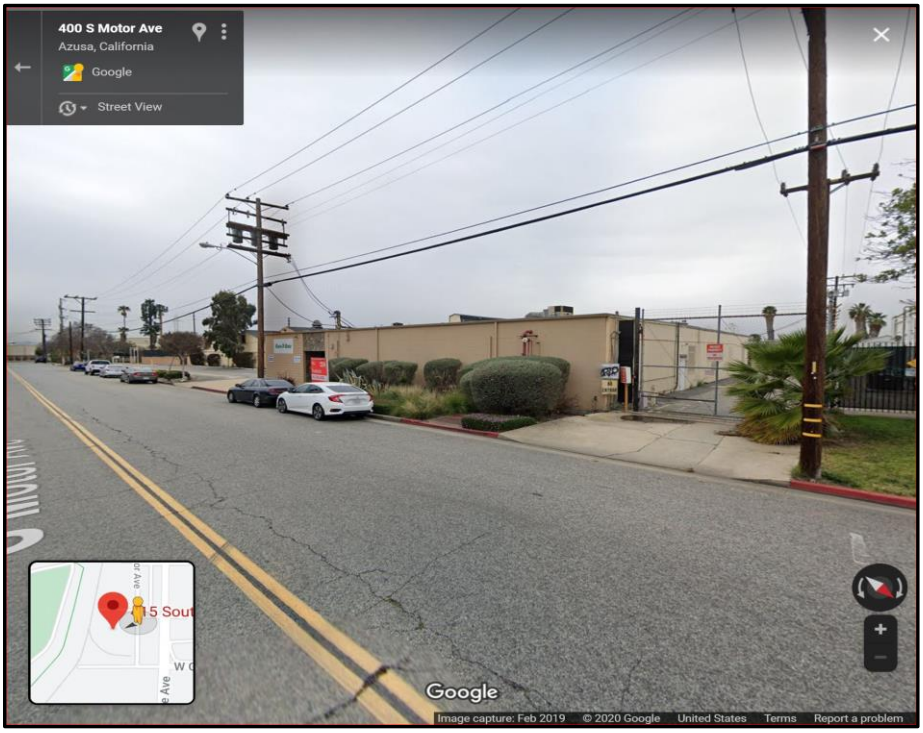

Figure 4 Site View from Motor Avenue
2019 Google StreetView™ of site facing southwest along Motor Ave.

Figure 5 Site View from Motor Avenue
2019 Google StreetView™ facing Northwest from SE corner of property

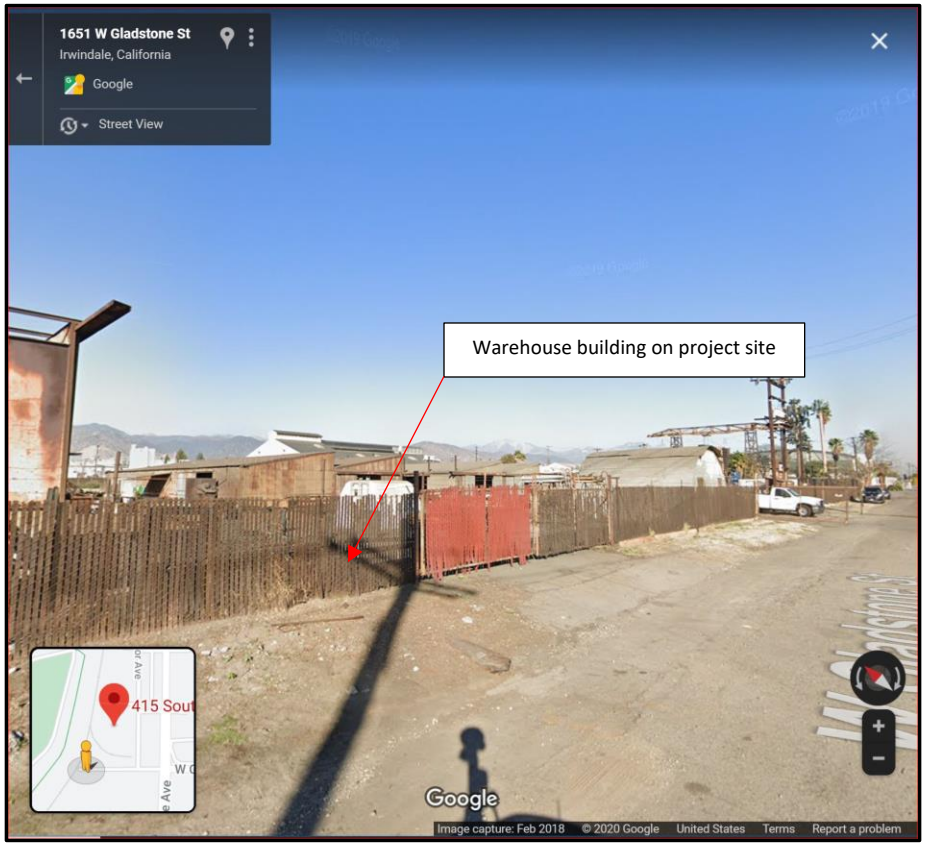

Figure 6 Site View from Gladstone Avenue

2019 Google StreetView™ facing northeast from Gladstone Avenue (foreground is not a part of the project site)

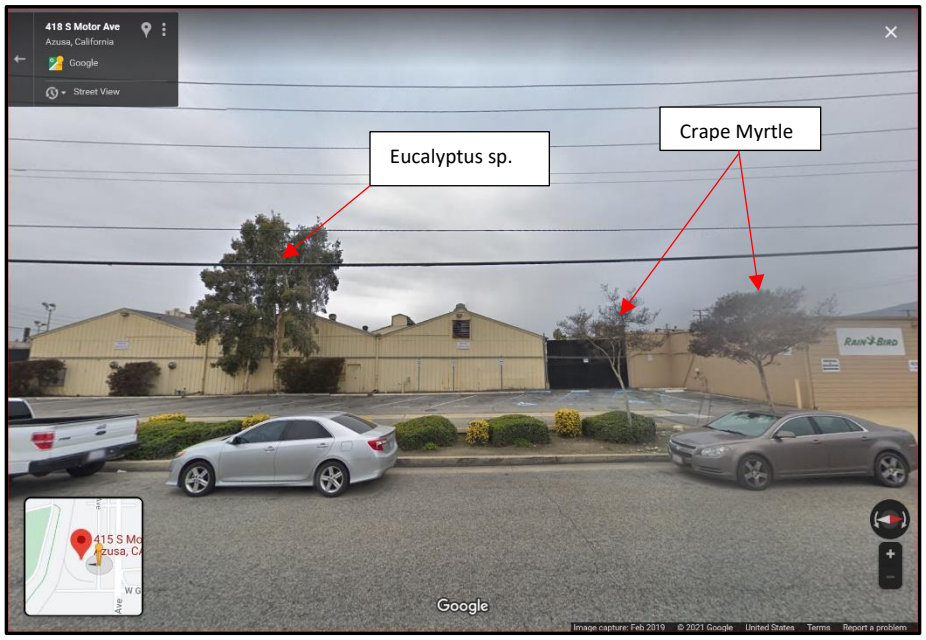

Figure 7 Site Landscaping

2019 Google StreetView™ facing west, showing site landscaping

Figure 8 Existing Street Trees
Google StreetView™ facing west, showing street trees

3.2 Background and Site History

The project site has been used for industrial purposes since the mid-1950s according to building records and aerial imagery (Salem Engineering Group, *Final AAI Phase I Environmental Site Assessment, Proposed Industrial Building, 411-435 South Motor Avenue, Azusa, CA* (August 3, 2020), pp. 7- 14 (Salem 2020)) The site was relatively undeveloped from 1928 (earliest records) through 1952. The first building (Building 1) was constructed between 1952 and 1957 (id., p. 14), and used for a brass foundry and machine shop. These uses ceased after 1990, and the building was used for product and resin storage. Building 2 was constructed in 1963 and used for light machining and assembly until 1971, valve and controls manufacturing until 1981, storage until 1997, extrusion (drip lines and tubing) until 2014, and storage since 2014. In 1960, Building 3 was constructed and was used for valve and controls manufacturing and silk screening until 1985, lawn-line parts and storage until 2005, and storage since 2005. In 1957, Building 4 was constructed and was used as a screw-machine shop until 1969, storage until 1972, non-ferrous die-casting shop until 1977, and storage since 2007. Building 5 was constructed In 1958 and was used as a core room until 1982, records storage until 2010, and general storage since 2010. In 1956, Building 6 was constructed in 1956 and has since been used for storage (including core storage for rock or soil core specimens)(id.). See Section 5.5, Hazards and Hazardous Materials, below, as well as Salem 2020, for details concerning hazardous material use and "recognized environmental conditions" on the property.

To date, several remediation procedures have taken place, including removal of underground diesel storage tanks, excavation, and removal of metal-containing soils (foundry sand with elevated levels of

copper, lead, and zinc), removal of two 1,000-gallon concrete clarifiers, installation and later removal of vapor extraction wells under Los Angeles County Fire Department supervision (soil vapor included tetrachloroethylene (PCE) and trichloroethylene (TCE)). As noted above, residual soil vapor has been determined to exceed current regulatory thresholds for commercial uses on the property.

3.3 Project Characteristics

The proposed project would construct a new 97,148 SF, 39'-tall tilt-up concrete warehouse on two adjacent parcels (183,000 SF/4.2 acres) at the northwest corner of the intersection of Motor Avenue and Gladstone Avenue in the City of Azusa, Los Angeles County, California. The structure would encompass 3,403 SF of office space and 2,900 SF of covered dock area. The project applicant has not specified the warehouse's purpose, and does not propose to operate the warehouse.

Figure 9 below lists the project's dimensions (building area, floor area ratio, office area) and elements such as parking and landscaping. Figures 10-17 show the project's conceptual architecture and specifications.

Architecture and Site Layout

Figures 10-12 illustrate the proposed building's architecture and overall layout. The warehouse structure would conform to the lot shape, which is an elongated quarter-circle bounded by Motor Avenue on the east, Gladstone Avenue, and a rail spur easement on the south and southwest, and the east-west property line on the north.

The office portion occupies the southeast corner of the building, facing Motor Avenue and Gladstone Avenue. Office windows take up approximately 1/5 of the building's Motor Avenue and Gladstone Avenue façades. Jointed concrete panels form the remainder of the south and east façades; these panels would be painted in alternating horizontal and vertical color bands, with horizontal and vertical jointing providing textural relief. The southwest, west, and north façades are similar to the non-windowed east façade.

Fifteen loading bays are proposed on the northwest side of the building facing the north property line. A portion of the northeast corner of the building projects approximately 40' north of the main structure, partially shielding the loading bays from Motor Avenue. The entrance to the loading area would be screened by an 8'-tall tilt-up concrete wall and 35'-wide sliding wrought-iron gate parallel to Motor Avenue (Figure 14).

Two trash enclosures are proposed: one is placed against the north property line, inside the gate, and would accommodate six dumpsters; the other is placed against the west property line, and would accommodate four dumpsters. The enclosures would be constructed of painted tilt-up concrete with steel gates. Neither enclosure area faces Motor Avenue.

Figure 12 shows the proposed color palette, a neutral combination of light gray, dark blue, beige, and khaki green.

Access, Parking and Circulation

Two 35'-wide access driveways are proposed at the north and south ends of the property along Motor Avenue. These connect a peripheral U-shaped driveway that surrounds the proposed structure. The gate

noted above would restrict entry to the loading areas, and a secondary gate on the south leg of the "U" would restrict entry to the west portion of the property.

There are 110 parking spaces within parking bays shown on the north, south and west sides of the building, including five accessible spaces, three motorcycle spaces, seven EV spaces with charging capability, 11 vanpool spaces and six bicycle spaces.

Landscaping

Figures 18-19 show the proposed landscaping. The project would install approximately 9,025 SF of landscaped area, including water-conserving trees, shrubs, and groundcover: Crape Myrtle, Chinese Elm, Bottle Tree, Mondell Pine, Brisbane Box, Hopseed Bush, Texas Ranger, Coast Rosemary, Dwarf Bottle Brush, Texas Privet, Creeping Rosemary, Dwarf Yellow Lantana, Autumn Sage, Deer Grass, Cleveland Sage, and Coyote Bush. Street trees (Carrotwood Tree) would also be planted along Motor Avenue to replace the existing Crape Myrtle trees, which are in poor condition. Much of the landscaped area would occupy the project's Motor Avenue street frontage, but plant materials would also be placed around the parking areas and along the south, southwest, and west property lines. A chain-link fence with vinyl slats would extend along the property line from the loading area wall to the secondary gate on the south side of the property (Figure 12). The landscape plans show a line of shrubs adjacent to this fence (Figure 16).

3.4 Goals and Objectives

CEQA Guidelines § 15124(b) requires that an EIR project description includes "[a] statement of objectives sought by the proposed project….The statement of objectives should include the underlying purpose of the project."

The project's goals and objectives include:

1. Clearing the project site of existing deteriorating structures, paving, and landscaping;
2. Merging parcel numbers AIN 8615-002-019 and 8615-002-020 to create a single parcel;
3. Importing approximately 4,620 cubic yards of fill material to create a building pad at a site elevation of 504 feet above mean sea level;
4. Installing necessary drainage devices to convey stormwater into the City storm drain system;
5. Installing a vapor mitigation system to remove PCE and TCE vapors from the site soils;
6. Conducting additional soil/site remediation to reduce soil contaminants to below regulatory thresholds;
7. Re-developing the project site with a 97,148 square-foot, 39-feet tall, warehouse structure encompassing 3,403 square feet of office space, with sufficient parking, access driveways, and landscaping;
8. Delivering a turn-key storage warehouse to interested buyers, in line with City economic-development goals; and
9. Providing a source of employment for skilled construction and warehouse workers.

3.5 Discretionary Actions Required

It is anticipated that City approvals required for the Project would include, but may not be limited to, the following:

- Design Review
- Lot Merger (two lots into one)
- Use Permit (24/7 operations

SITE AREA			SF	ACRES
SF				183,004
Acres				4.20
BUILDING AREA		BOMA	CBC	PLANNING
	Ground Floor Office	3,403	2,790	3,004
	Warehouse	87,597	87,160	87,996
Total Building Footprint		**91,000**	**89,950**	**91,000**
	Mezzanine	3,403	2,933	3,148
TOTAL BUILDING AREA		**94,403**	**92,883**	**94,148**
	Covered Dock Area	2,900	2,900	2,900
TOTAL BUILDING + COVERED DOCK AREA		**97,303**	**95,783**	**97,048**
COVERAGE				**51.3%**
FAR				**53.0%**
PARKING REQUIRED			Ratio	Required
Office			1/300	21
Warehouse			1/1000	88
TOTAL PARKING REQUIRED				**109**
PARKING PROVIDED				Stalls
Handicap				5
Parallel				3
Standard				102
TOTAL PARKING PROVIDED				**110**
CLEAN AIR/VAN POOL/EV PARKING		Ratio	Required	Provided
	CA/VP (101 - 150 Parking Spaces)		**11**	**11**
	EV (101 - 150 Parking Spaces)		**7**	**7**
MOTORCYCLE PARKING				
		1/50	**3**	**3**
BICYCLE PARKING				
	0 - 100 Parking Spaces	1/20	5	
	100+ Parking Spaces	1/100	1	
			6	**6**
DOCK DOORS				**15**
GRADE DOORS				**1**
LOADING SPACES REQUIRED			Required	Provided
	10,000 - 40,000 sf	1	1	
	40,000 sf+	1/40,000 sf	2	
			3	**3**
LANDSCAPE			% Gross Area	Area (S.F.)
Required (10% of Gross Parking Area)		10.0%	42,775	4,278
Provided		16.0%		6,843
Total Overall Landscape Area		21.1%		9,025

PROJECT TABULATIONS | 2

Figure 9 Project Data

3.6 Project Plans

MOTOR AVENUE WAREHOUSE

415-435 MOTOR AVENUE
AZUSA, CA 91702

OWNER
LAFFERTY INVESTMENT CO
970 N. SIERRA MADRE AVENUE
AZUSA, CA 91702

APPLICANT
REXFORD INDUSTRIAL REALTY
11620 WILSHIRE BOULEVARD, 10th FLOOR
LOS ANGELES, CA 90025
PHONE: 424-256-8732
CONTACT: REMCO WEIJS
rweijs@rexfordindustrial.com

ARCHITECT
GAA ARCHITECTS, Inc.
8911 RESEARCH DRIVE, SUITE 200
IRVINE, CA 92618
PHONE: 949-474-1775
FAX: 949-553-9133
CONTACT: ROGER GRIFFIN
rogerg@GAAarchitects.com

CIVIL
SITE ENGINEERING, Inc.
160 S. OLD SPRINGS ROAD, SUITE 210
ANAHEIM HILLS, CA 92808
PHONE: 714-685-6860
CONTACT: GREGORY K. COOKE
gcooke@site-eng.com

LANDSCAPE
SOLA, INC.
2883 VIA RANCHEROS WAY
FALLBROOK, CA 92028
PHONE: 760-942-5882
CONTACT: SCOTT PETERSON
scott@sola-inc.com

PROJECT TEAM

ASSESSOR'S PARCEL NUMBER:
8617-002-017 & 22

SITE INFORMATION

COVER
T1 TITLE SHEET
T2 PROJECT RENDERINGS

CIVIL
1 CONCEPTUAL GRADING PLAN
2 CONCEPTUAL UTILITY PLAN

LANDSCAPE
L-1 CONCEPTUAL LANDSCAPE PLAN- SIM
L-2 LANDSCAPE AREA CALCULATIONS EXHIBIT

ARCHITECTURAL
A1.0 SITE PLAN, AND PROJECT TABULATIONS
A1.1 FENCE & SITE WALL PLAN
A1.2 BUILDING SECTIONS
A2.0 BUILDING FLOOR PLAN
A4.1 BUILDING ELEVATIONS
A4.1C COLOR BUILDING ELEVATIONS

SHEET INDEX

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415-435 MOTOR AVENUE
AZUSA, CA 91702

DEVELOPED FOR:
REXFORD INDUSTRIAL REALTY

NO.	DESCRIPTION	DATE
1	PPR SUBMITTAL	12/04/2019

TITLE SHEET

JOB NO: REXXXX.01
DATE: 01/27/20
DRAWN: GAA
FILE NAME: REXXXX_T1

SHEET NO: T1

Figure 10 Renderings of Proposed Warehouse

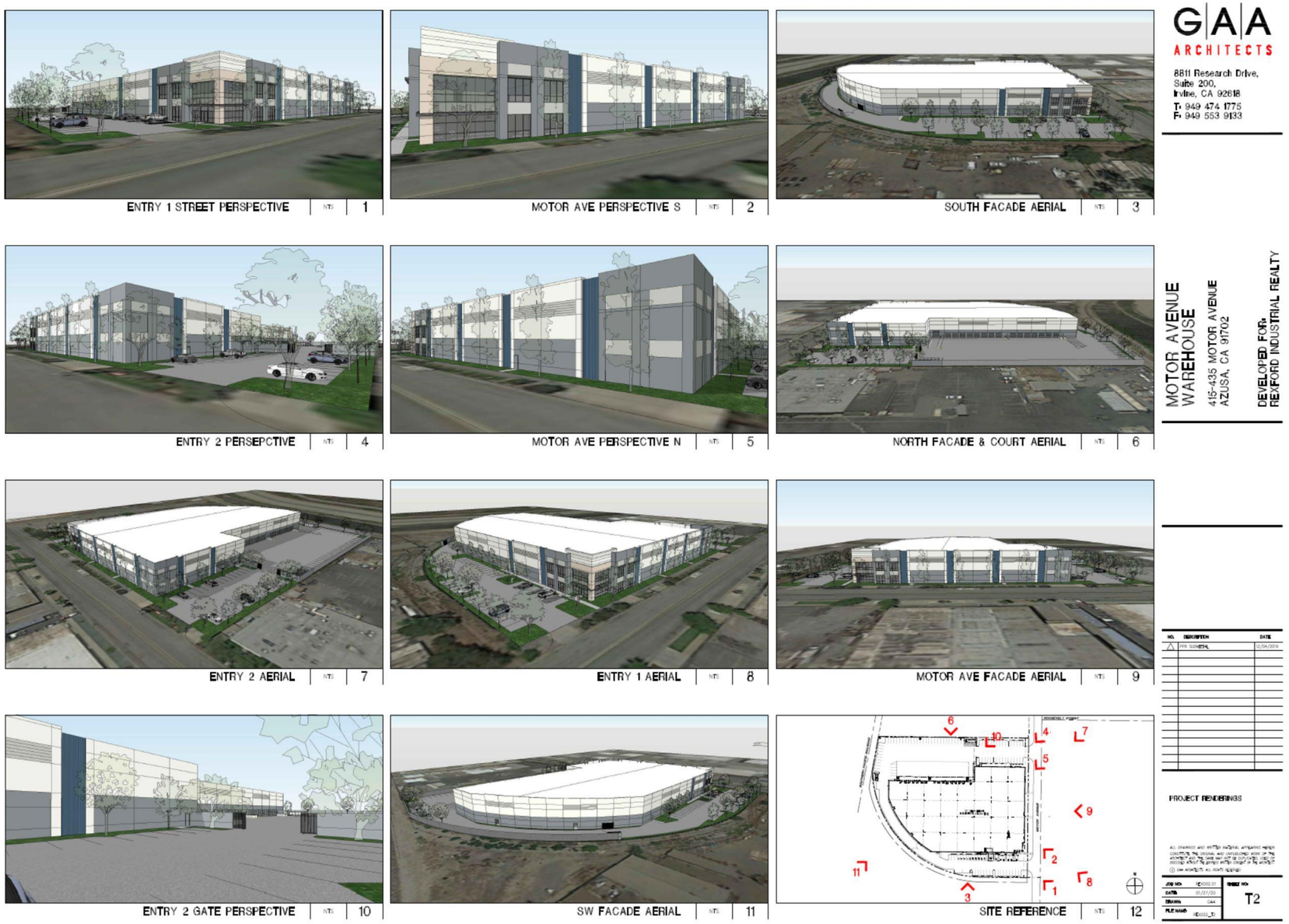

Figure 11 Renderings of Project and Site Layout

Figure 12 Elevations and Color Schedule

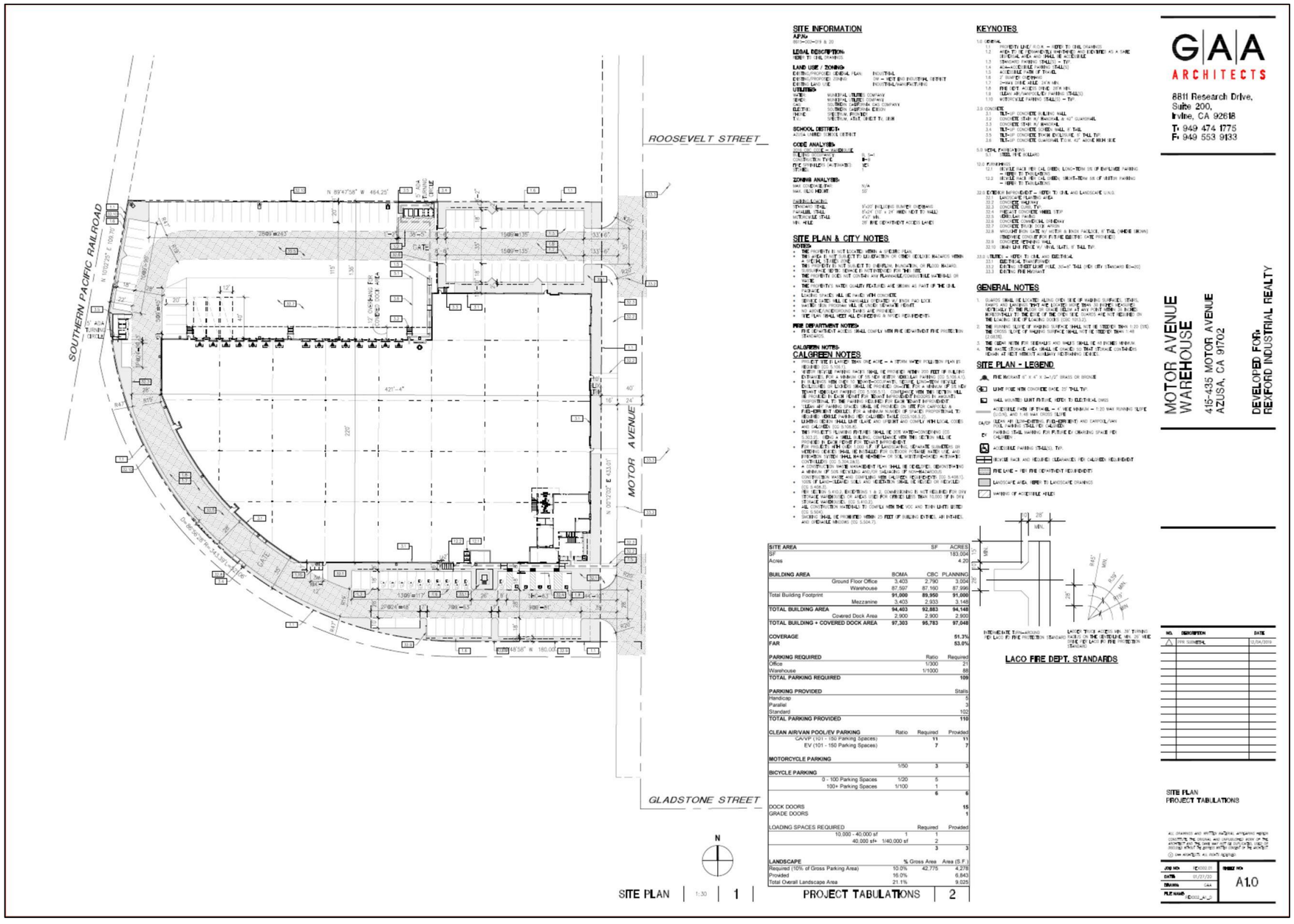

Figure 13 Site Plan

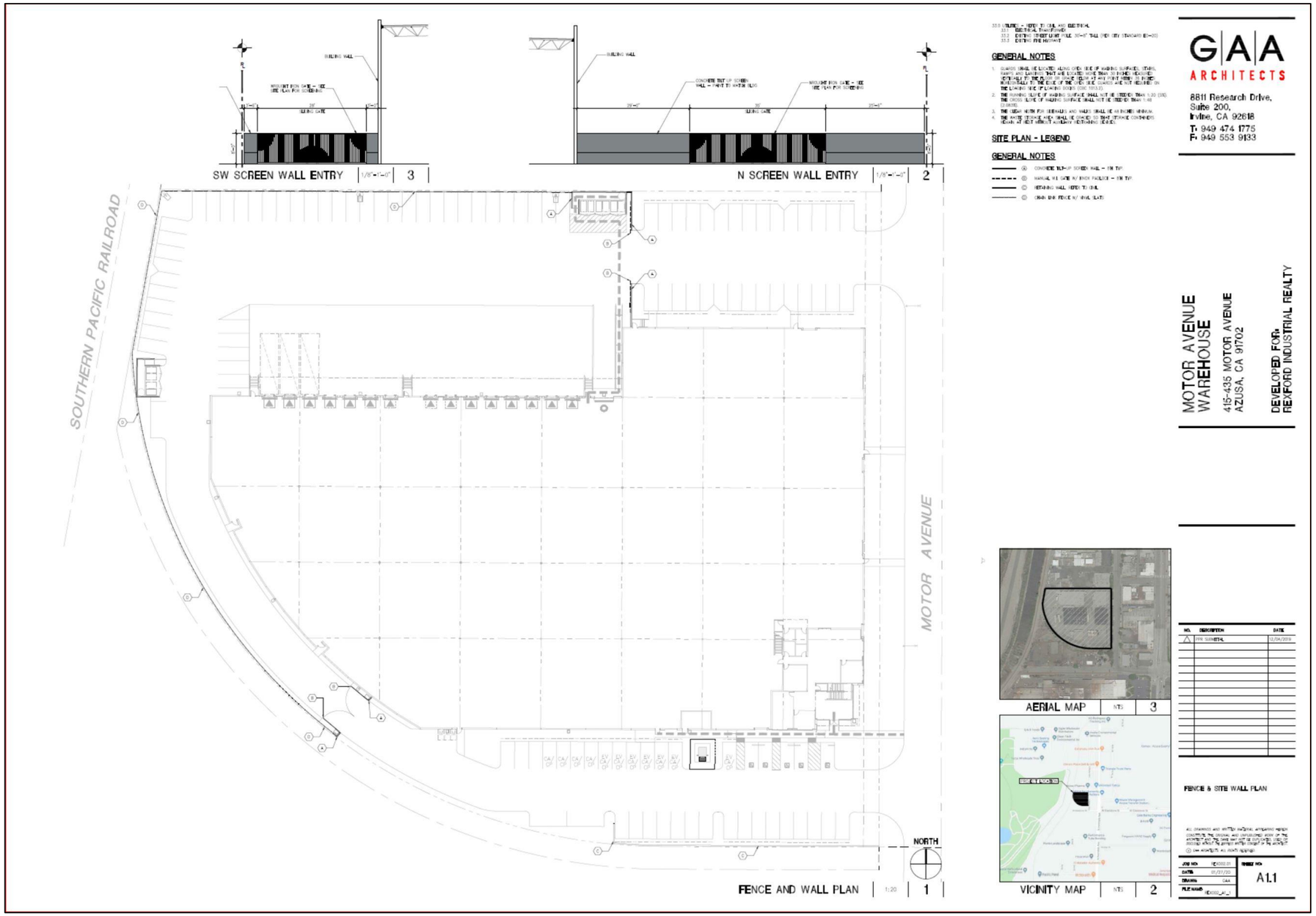

Figure 14 Fence and Wall Plan

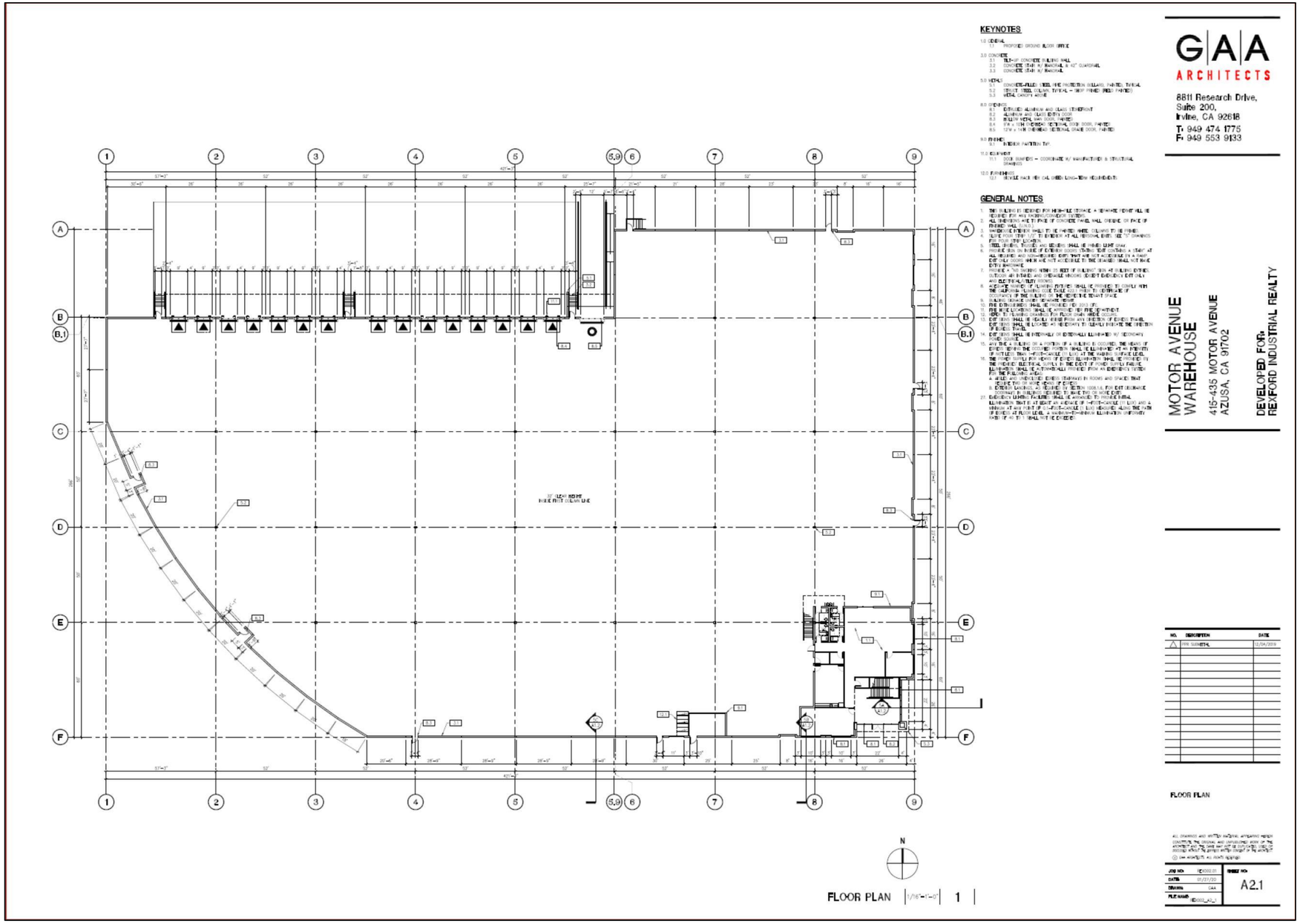

Figure 15 Floor Plan

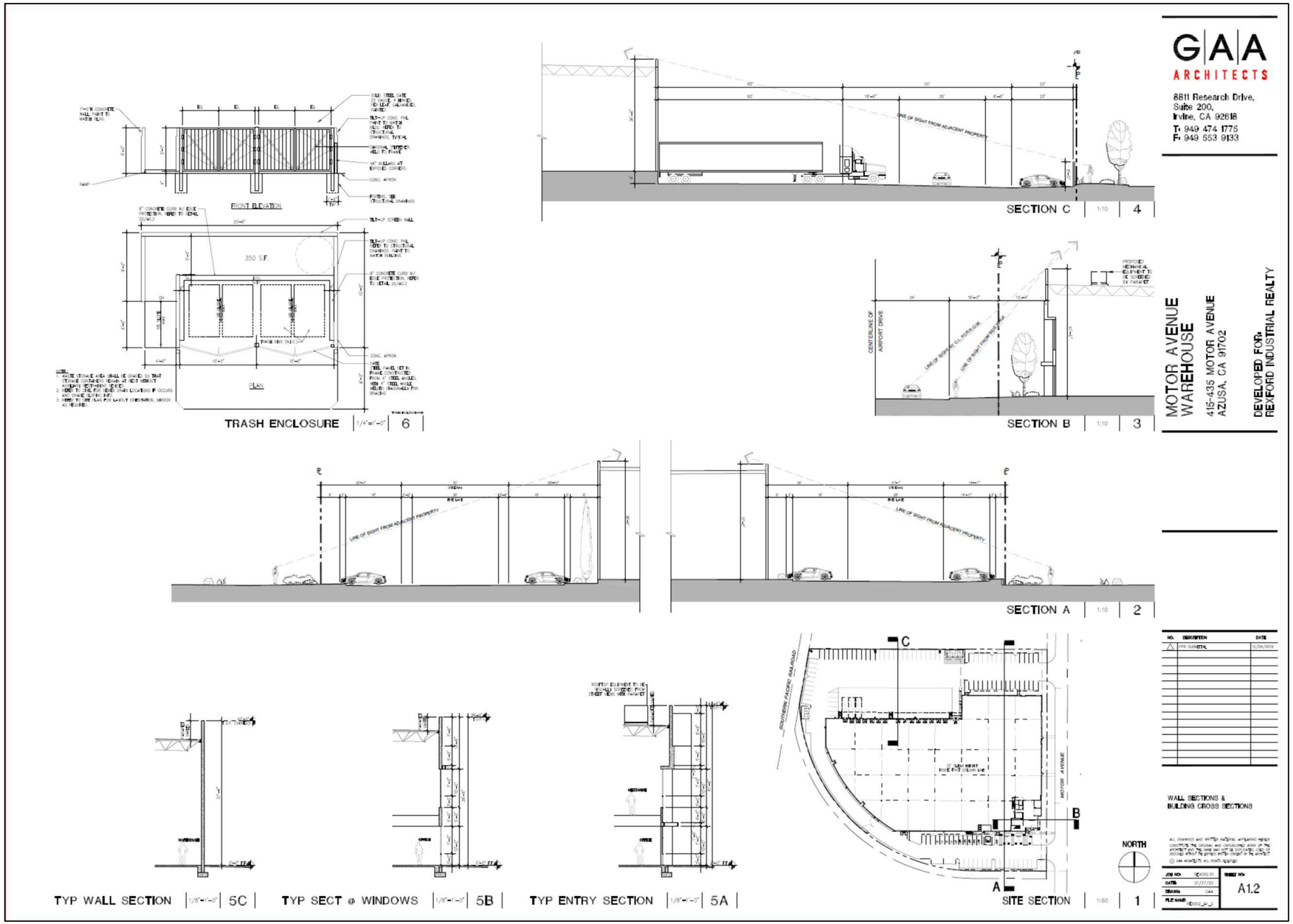

Figure 16 Architectural Sections

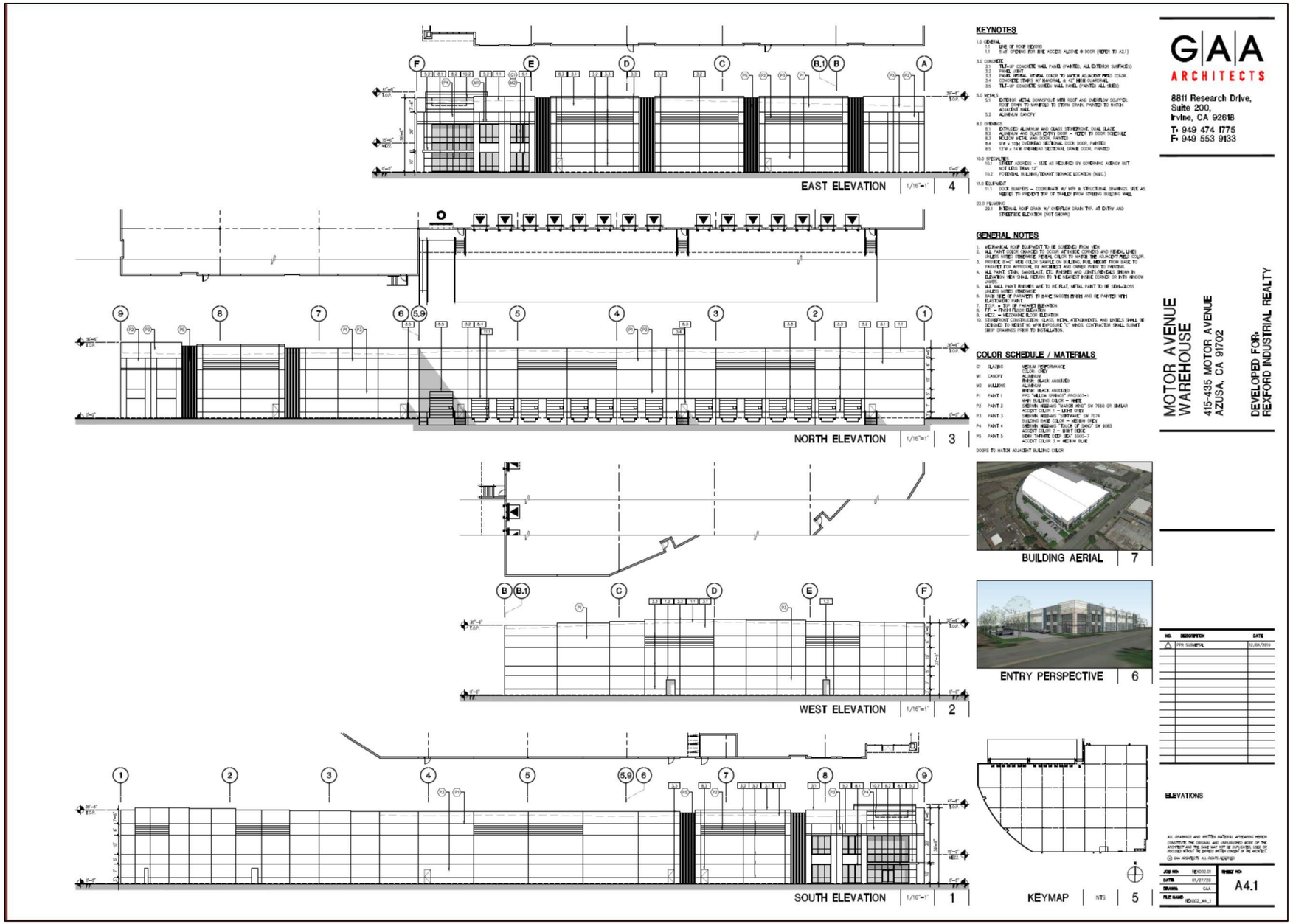

Figure 17 Architectural Elevations

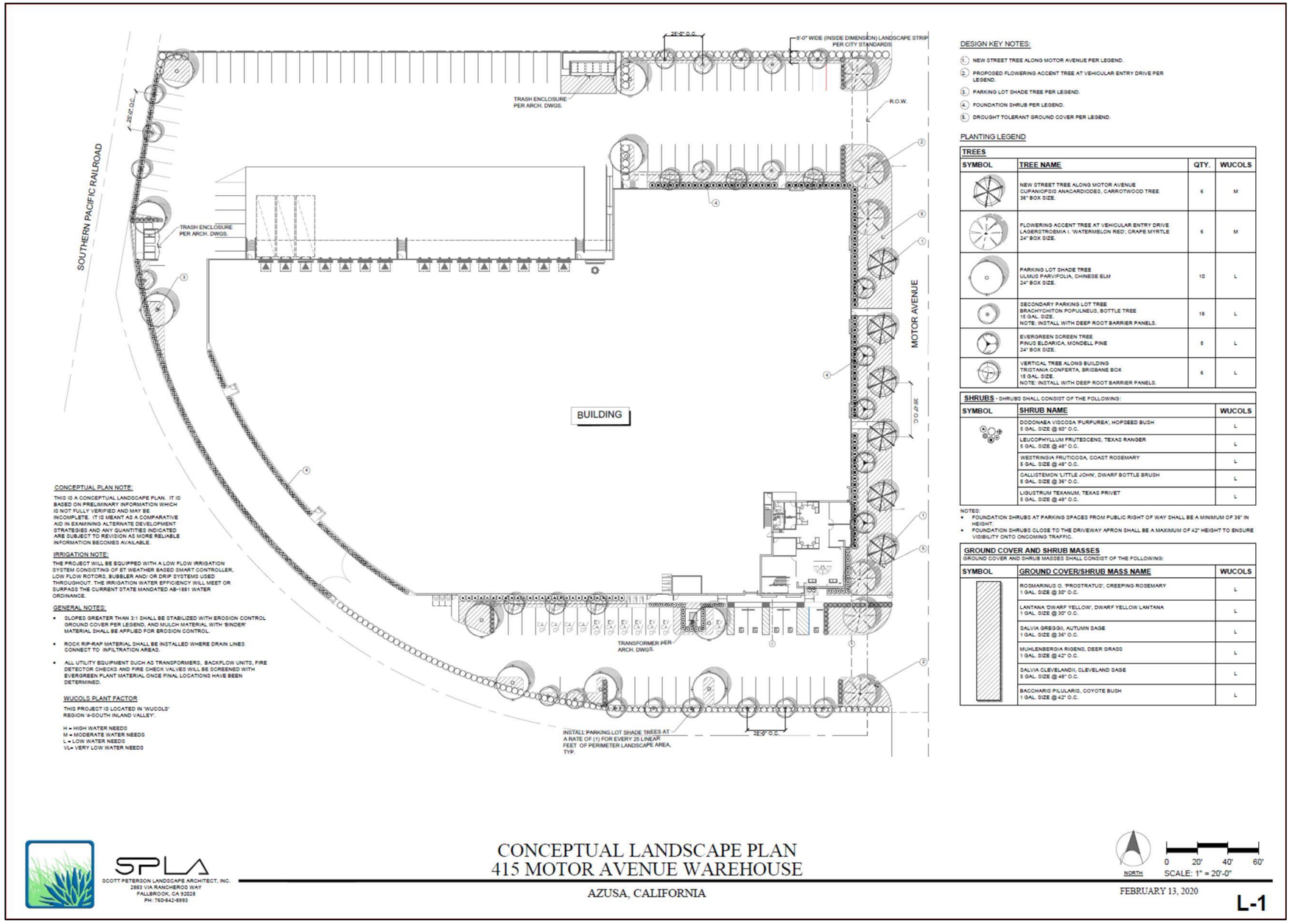

Figure 18 Conceptual Landscape Plan

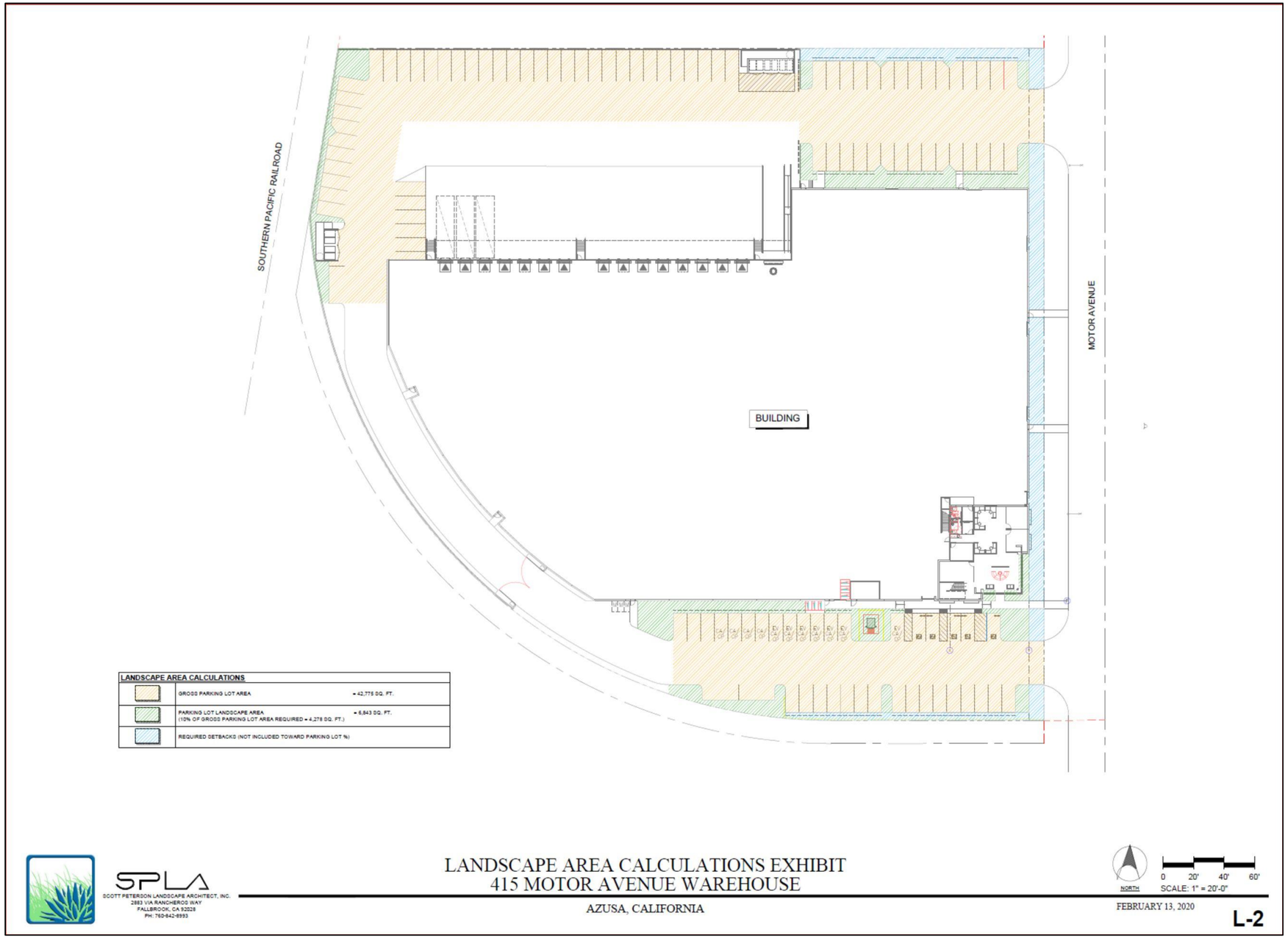

Figure 19 Landscape Calculations

4.0 Cumulative Analysis Factors

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4 Cumulative Impact Analysis Factors

CEQA Guidelines Section 15355 provides the following definition of cumulative impacts:

> "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Pursuant to CEQA Guidelines §15130(a), cumulative impacts of a project shall be discussed when they are "cumulatively considerable," as defined in CEQA Guidelines §15065(a)(3). Section 5.0, Environmental Analysis, of this EIR assesses cumulative impacts for each applicable environmental issue, and does so to a degree that reflects each impact's severity and likelihood of occurrence. As indicated above, a cumulative impact involves two or more individual effects. Per CEQA Guidelines Section 15130(b), the discussion of cumulative impacts shall be guided by the standards of practicality and reasonableness, and should include the following elements in its discussion of significant cumulative impacts:

1. Either:
    a. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the Agency, or
    b. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.
2. When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.
3. Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.
4. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
5. A reasonable analysis of the cumulative impacts of the relevant projects, including examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

This EIR evaluates the Project's potential cumulative impacts using both the list and summary of projections approaches depending upon which approach is appropriate/relevant for each environmental issue area. The geographic area considered for cumulative impacts varies depending on the environmental issue area.

Table CP-1, *Cumulative Projects List*, and Figure 20, Cumulative Projects Map, identify recently-approved or proposed projects similar to the proposed project within a two-mile radius of the project site that could interact with the Project, causing cumulative effects. Information about these projects is available at the listed URLs, all accessed March 25, 2021. The two-mile radius was considered sufficient for analyzing cumulative effects because the long-term environmental impacts associated with warehouse-office projects are largely operational (such as air pollutant and greenhouse gas emissions) and become difficult to associate with individual projects at greater distances from a project site. For example, emissions from warehouse-related trucks would be generated along the routes that the trucks travel to and from the warehouse. Because those routes are not fixed and distances traveled vary, emissions-generation cannot be predicted with specificity.

Before the 2018 change to the CEQA Statute and Guidelines that requires environmental documents to evaluate transportation impacts according to a vehicle-miles-traveled metric, cumulative impact analysis focused on vehicle trip distribution and aggregate vehicle trips from a wide range of projects in the area projected to be affected by a project. As is explained in Section 5.5, CEQA now states that vehicle delay is not an *environmental* impact. Consequently, evaluation of cumulative impacts in this document will not include a discussion of intersection or road segment congestion resulting from combined new projects.

Individual EIR sections will address each impact topic area with respect to generalized cumulative impacts.

Table CP-1 Cumulative Projects List

No.	Project Name/Location	Land Use	Size/Quantity
1	Canyon City Business Park 1025 N. Todd Ave., Azusa https://www.ci.azusa.ca.us/1682/Canyon-City-EIR	Warehouse/Office Manufacturing/Office	463,316 square-foot project in 7 buildings
2	CT Aerojet Project 301 Aerojet Avenue, Azusa https://www.azusaca.gov/1373/301-Aerojet	Warehouse/ Office	181,000 square-foot project in 3 buildings
3	Irwindale Reliance II Business Park NW quadrant of I-210 and Irwindale Ave., Irwindale https://www.irwindaleca.gov/394/Reliance-II-Specific-Plan	Warehouse/	1,241,440 square feet
		Industrial Park	612,058 square feet
		Fast Food	5,000 square feet
		Commercial Retail	5,000 square feet
4	Olive Pit Mining and Reclamation SW quadrant of Azusa Cyn. Rd. and Olive St., Irwindale https://www.irwindaleca.gov/DocumentCenter/View/1113/EXECUTIVE-SUMMARY_corrected?bidId=	Mining and Reclamation	1 MT/YR
5	5175 Vincent Avenue Project, Irwindale https://www.irwindaleca.gov/DocumentCenter/View/6474/Irwindale-5175-Vincent-Ave-DEIR-February-2021-Submittal?bidId=	Warehouse	545,735 square feet

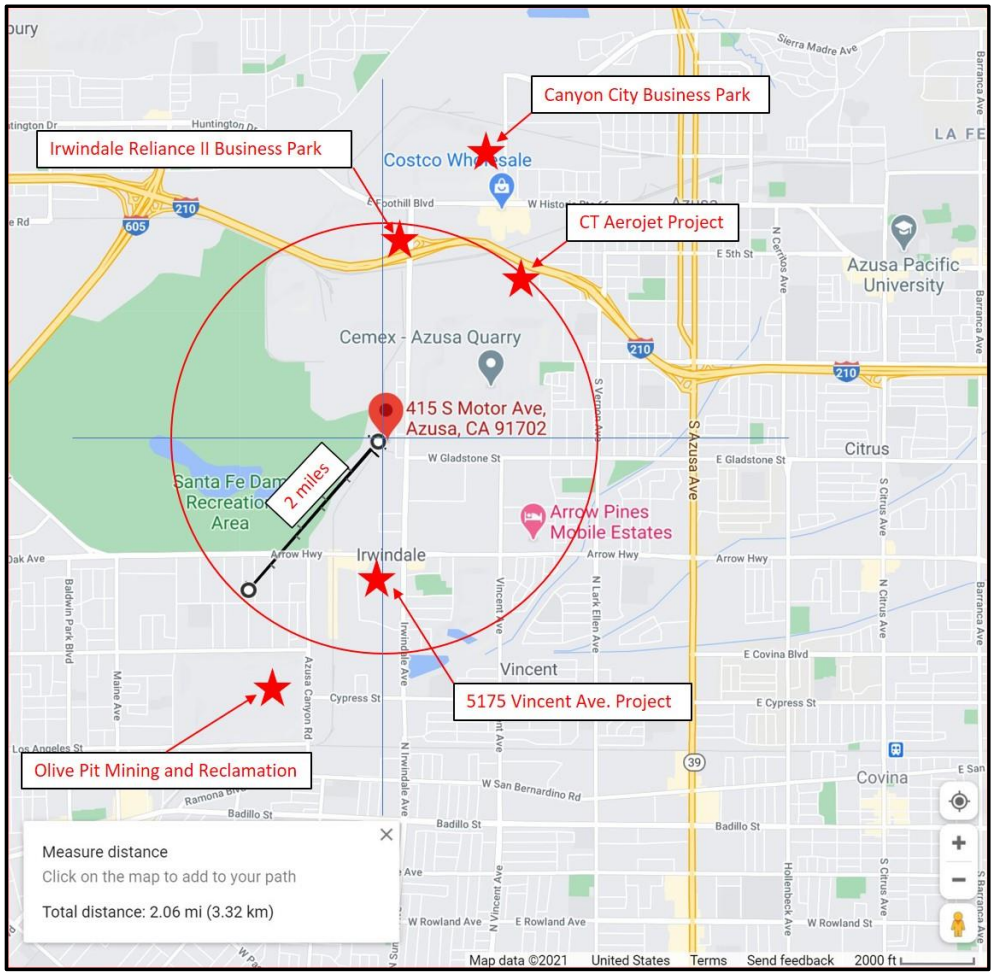

Figure 20 Recently-Approved Cumulative Projects of Similar Type

5.0 Environmental Analysis

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5 Environmental Analysis

5.1 Effects Requiring Mitigation Measures Discussed in Initial Study

5.1.1 Biological Resources

The Initial Study prepared for the project concluded that the project would not significantly impact biological resources, because the project site has been developed for years with industrial uses, is surrounded by industrial uses on the north, east and south, is buffered from the Santa Fe Dam/San Gabriel River open space by a railroad embankment and a levee and supports little ornamental vegetation. The trees present on and adjacent to the subject property include six Crape Myrtle (*Lagerstroemia indica*) street trees, a single Mexican Fan Palm (*Washingtonia robusta*), and three *Eucalyptus* sp. trees (see Figures 4-8). Ornamental shrubs on the subject property have been pruned into small geometric shapes, likely by powered hedge trimmers. There is no established groundcover (low spreading shrubs) suitable for ground-nesting species.

Comments from the California Department of Fish and Wildlife (CDFW) responding to the Notice of Preparation indicated that the trees and shrubs present on the property could support nesting birds during the typical nesting season, February through August. Some bat species could also roost in the trees or abandoned buildings. Most bird species, even those not listed as endangered, threatened or "of concern" are protected under the U.S. Migratory Bird Treaty Act (16 U.S.C. §§ 703-712). This statute and accompanying regulations make it unlawful, without a waiver or permit, to pursue, hunt, take, capture, kill, or sell specifically-listed migratory birds, and to possess any bird parts, including feathers, eggs, and nests. The Migratory Bird List was amended as recently as 2020, and now contains 1,093 species. Common birds such as house finches are on this list. Bat species that could be present on the project site per the CDFW letter include the western yellow bat (*Lasiurus xanthinus*), big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), and pallid bat (*Antrozous pallidus*). CDFW stated that "the western, free-tailed, and pallid bat species are all designated California Species of Special Concern. Despite the high diversity and sensitivity of bats in Southern California, numerous bat species are known to roost in trees and structures throughout Los Angeles County" (Ms. Erinn Wilson-Olgin, CDFW South Coast Region, Letter to Mr. Dean Flores, City of Azusa, December 8, 2020, p. 2 (Wilson-Olgin).

The CDFW describes "Species of Special Concern" (SSC) as "a species, subspecies, or distinct population of an animal [bird, mammal, reptile, amphibian, fish] native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status;
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status.

The SSC designation is administrative and SSCs have no formal legal status. The CDFW does not require "take" permits where SSCs could be impacted by project development. However, the CDFW strongly recommends that lead agencies cooperate in protecting these species in order that development projects do not impair them to the extent that their existence or reproductive capacity is further harmed (see California Department of Fish and

Wildlife, *Species of Special Concern*, available at https://wildlife.ca.gov/Conservation/SSC#394871316-what-is-a-species-of-special-concern , accessed March 22, 2021).

Because of the potential presence of nesting bird species and SSC bat species, the CDFW advised that a "thorough" field assessment for such species be conducted (Wilson-Olgin, p. 5). Additionally, the CDFW advised that field studies should be conducted to evaluate the project's impacts on sensitive plant species that have been identified to exist in the project's environs (id).

The City of Azusa has determined that no further biological resource assessment is necessary for this project, because of several factors: (1) All project construction will be limited to the project site and will not extend into undisturbed terrain; (2) The project site has been used for industrial purposes since at least the 1950s; (3) The project site is completely paved and occupied by structures, except for the ornamental irrigated-landscape planting beds; (4) There is no undisturbed native vegetation on the project site; (5) There is no evidence that CDFW personnel have visited the project site to confirm the letter's statements regarding sensitive species; and (6) A comprehensive assessment as suggested by the CDFW would require time, personnel resources, and funds, and would likely yield no meaningful information. Nonetheless, the following mitigation measures are set forth below to avoid impacts to animal species that may occupy the project site:

Mitigation Measures

Bio-1 To prevent take of listed bird species or their nests, or roosting bats, the project proponent shall:

a. Prior to obtaining demolition and grading permits, and within two weeks of site construction activities, (demolition, site preparation, grading), the project proponent shall conduct a pre-construction survey to rule out the presence of nesting birds or roosting bats on the subject property. The survey shall be performed by one or more CDFW-certified biological consultants with experience in avian and bat species with potential to be present. Protocol-level surveys are not required.

b. If the survey results include evidence that protected species are nesting or roosting on the subject property, its buildings or vegetation, the biological consultant shall prepare a written, comprehensive avoidance/mitigation strategy that shall be carried out by the project proponent. This strategy may include but is not limited to the following measures:

    1. Postponing construction until no active nests or roosts are present on the subject property (i.e., fledglings and adults have abandoned all nests; no active roosts are identified);

    2. If nests/roosts are discovered, the project proponent shall engage a qualified biological consultant to:

        i. Obtain any applicable permits from the CDFW and comply with permit requirements;

        ii. Maintain a 300' buffer zone around any active nests or roosts, indicating the zone with temporary construction fencing and signage;

        iii. Train construction workers on-site before demolition begins;

        iv. Monitor the project site twice weekly to gauge nest/roost occupancy status;

        v. Direct exclusion methods to prevent re-occupation of nests after nest abandonment.

        vi. Prepare report(s) documenting survey results and follow-up measures to the satisfaction of the City.

3. **Demolition and grading permits shall not be granted until the project proponent has demonstrated to the satisfaction of the City that Measures Bio-1(a) and (b) have been performed.**

c. If the pre-construction survey does not reveal nesting birds or roosting bats, no additional action is necessary and demolition may proceed provided that it occurs within two weeks of the field survey.

Bio-2 To prevent the take of protected plant species that may be present on-site, the project proponent shall:

a. Prior to obtaining grading or demolition permits, and within two weeks of site construction activities, (demolition, site preparation, grading), the project proponent shall conduct a pre-construction survey to rule out the presence of listed plant species on the subject property. The survey shall be performed by one or more CDFW-certified biological consultants with experience in California-native plant species with potential to be present.

b. If such plants are discovered on the project site, the project proponent shall direct the biological consultant to seek applicable permits from the CDFW and if required, the U.S. Fish and Wildlife Service (USFW). Permit requirements may include preparing an avoidance or salvage plan, implementing the plan, and conducting follow-up actions as required. Mitigation may include purchase of mitigation credits at a biologically-similar mitigation bank, at the discretion of the CDFW or the USFW. **Demolition or grading permits shall not be issued until applicable permits have been obtained and a compliance method implemented.**

c. If no sensitive plant species are identified on-site, then no further action is required and demolition and grading permits may be granted.

Bio-3 To prevent spread of non-native invasive plant species and to comply with the CalGreen Building Code provisions for drought-adapted plant material, the final project landscape plant palette shall not contain plants listed on the California Invasive Plant Council checklist, available at https://www.cal-ipc.org/wp-content/uploads/2018/05/InvasivePlantChecklistforCaliforniaLandscaping.pdf (accessed March 22, 2021). Prior to approval of final landscape plans, the project proponent shall demonstrate to the City's satisfaction that no known invasive species have been incorporated into the project's plant palette.

Significance After Mitigation

With implementation of the mitigation measures above, impacts to listed birds, plants and SSC bats are anticipated to be less than significant.

Cumulative Impacts – Biological Resources

The proposed project is not anticipated to contribute cumulatively to impacts on biological resources. As is described in the Initial Study, Section 3, Biological Resources, and Section 11, Land Use, the project site is in an area of the City that has been previously developed for industrial uses, and itself has been previously developed. The projects listed in Table CP-1 above also propose to re-develop land that has previously been used for industry or mining, and would not contribute to habitat loss. Mitigation measures would be applied to the proposed project to preclude impacts to nesting birds or roosting bats in on-site trees and structures. Even where these measures are not applied, existing regulations, when enforced, serve to protect listed species. Trustee agencies (U.S. Fish and Wildlife Service, California Resources Agency/Department of Fish and Wildlife) are informed of discretionary projects through the CEQA notification process and are given the opportunity to

comment and require mitigation measures, which would reduce or eliminate cumulative impacts to biological resources.

5.1.2 Cultural Resources

Section 5 of the Initial Study, Cultural Resources, indicates that potentially significant impacts to unknown cultural resources could occur. Such impacts could be reduced to less-than-significant levels with application of the Azusa General Plan Historic and Cultural Policy 1.1, Program HR2 (Archaeological Surveys), the City's standard conditions of approval and Mitigation Measure Cul-1 below (See City of Azusa General Plan, Chapter 3, *The Built Environment*, pp. 3-105 – 3-106).

Generally, impacts to cultural resources are significant if they:

- Cause a substantial change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5;
- Cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines § 15064.5; or
- Disturb any human remains, including those interred outside of formal cemeteries.

Specifically, there are no known known historical, archaeological, or tribal resources present on the project site, and the site's structures do not appear on the City's list of potential cultural-historic landmarks (City of Azusa, *General Plan & Development Code Final Environmental Impact Report*, Table 4.5-1, pp. 4.5-5 – 4.5-6 (November 2003)). The site has been previously disturbed by both above-ground construction and below-ground surface excavation for installation of storage tanks and later removal of the tanks (see Salem Engineering, *Final AAI Phase I Environmental Site Assessment, Proposed Industrial Building, 411-435 South Motor Avenue, Azusa, California* (August 3, 2020), incorporated by reference into this EIR, for a description of the site's history. However, undiscovered materials or remains may still be revealed during site preparation. California Health and Safety Code § 7050.5 and Public Resources Code § 5097.98 regulate evaluation and treatment of human remains, and the standard City of Azusa conditions of approval (set forth in Table ES-1) require that if subsurface resources are found during excavation or other ground-breaking activities, work must stop and the construction contractor must contact the Community Development Department. The Community Development Director would then require that the developer engage a City -approved Registered Professional Archaeologist to evaluate the find and prepare and implement a Research Design and Data Recovery Program to mitigate impacts.

The mitigation measures proposed in the Initial Study require essentially the same actions as are outlined in the General Plan and the City's standard conditions of approval for discretionary projects, and thus are not added as supplemental measures in this document. Still, to ensure that all project construction workers are aware of the required conditions of approval and their role in implementing those conditions, the following mitigation measure is required:

Mitigation Measure

Cul-1 Before site grading and/or excavation begins, the project proponent shall engage a Registered Professional Archaeologist (RPA) to conduct an on-site pre-construction training for job site personnel and equipment operators. The City of Azusa building inspector assigned to the project shall attend and document this training. The training may be a "tailgate" training but must be sufficient to inform all workers that undiscovered cultural resources may be present on-site and that conditions of approval intended to protect

those resources attach to the project. The RPA shall also train site workers how to recognize cultural resources upon discovery to ensure compliance with the conditions of approval.

Significance after Mitigation

With implementation of the mitigation measure Cul-1 and City standard conditions of approval, impacts to cultural resources are anticipated to be less than significant.

Cumulative Impacts – Cultural Resources

The proposed project is not anticipated to contribute cumulatively to impacts on cultural resources. Such impacts would arise if the project, combined with other projects, would adversely affect an area known for prehistoric occupancy, sacred landscapes, or with suitable characteristics for human habitation or paleontological deposits. As is described in Section 3.2, *Background and Site History*, and Section 5.4, *Hazards and Hazardous Materials*, of this EIR and in the Initial Study, Section 4, *Cultural Resources*, the project site has been subject to prior excavation and disturbance; if important resources had been present on-site, they would likely have been discovered or inadvertently destroyed. The Azusa General Plan does not identify historical or cultural resources on the project site or its environs, and designates the area encompassing the site for industrial uses. The standard conditions and regulatory measures apply equally to all discretionary City projects. Discretionary projects in neighboring cities are also subject to California Health and Safety Code § 7050.5 and Public Resources Code § 5097.98, as well as to cultural resources mitigation measures in their respective CEQA documents. With these regulations and mitigation measures in place in the City of Azusa and neighboring cities, cumulative impacts are not anticipated to occur.

5.1.3 Effects Determined Not to be Significant

The project's effects on the environmental topics listed below were examined in the Initial Study prepared for the project (attached to this Focused EIR) and determined not to be significant:

- Aesthetics
- Agricultural Resources
- Energy
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

5.2 Air Quality

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5.2 Air Quality

This section analyzes the potential direct and cumulative air quality impacts of the proposed project and determines whether implementation of the proposed project would result in air emissions that exceed applicable air quality standards, cause cumulatively considerable increases in criteria pollutants, significantly impact sensitive receptors, or create objectionable odors.

5.2.1 Environmental Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. The physical features and atmospheric conditions of a landscape interact to affect the movement and dispersion of pollutants and determine its air quality.

Basin Climate and Meteorology

The project is located within the South Coast Air Basin (SCAB). The Basin's climate is classified as Mediterranean, but weather conditions within the Basin are dependent on local topography and proximity to the Pacific Ocean. The climate is dominated by the Pacific high-pressure system that results in generally mild, dry summers and mild, wet winters. This temperate climate is occasionally interrupted by extremely hot temperatures during the summer, Santa Ana winds during the fall, and storms from the Pacific northwest during the winter. In addition to the Basin's topography and geographic location, El Niño and La Niña patterns also have large effects on weather and rainfall received between November and March.

Annual rainfall in Azusa averages approximately 17 inches, with rainfall occurring predominantly during the winter months. The coolest month of the year is December, with an average low of 42° Fahrenheit (F). The warmest month is August, with temperatures in the low 90s.

The Pacific high-pressure system drives the prevailing winds in the Basin. The winds tend to blow onshore in the daytime and offshore at night. In the summer, an inversion layer is created over the coastal areas and increases ozone levels. A temperature inversion is created when a layer of cool air is overlain by a layer of warmer air; this can occur over coastal areas when cool, dense air that originates over the ocean is blown onto land and flows underneath the warmer, drier air that is present over land. In the winter, areas throughout the Basin often experience a shallow inversion layer that prevents the dispersion of surface level air pollutants, resulting in higher concentrations of criteria air pollutants such as carbon monoxide (CO) and oxides of nitrogen (NO_X).

In the fall months, the Basin is often impacted by Santa Ana winds. These winds are the result of a high-pressure system over the Nevada-Utah region that overcomes the westerly wind pattern and forces hot, dry winds from the east to the Pacific Ocean. These winds are powerful and incessant. A strong Santa Ana wind can easily exacerbate fire conditions, resulting in worsening air quality throughout the Basin as smoke and ash are pushed into the region.

An El Niño event is a warming of the surface waters of the eastern Pacific Ocean. It is a climate pattern that occurs across the tropical Pacific Ocean that is usually associated with drastic weather occurrences, including enhanced rainfall in Southern California. La Niña is a term for cooler-than-normal sea-surface temperatures across the Eastern Pacific Ocean. The Los Angeles region typically receives less than normal rainfall during La Niña years.

5.2.2 Regulatory Setting

Federal Regulations

Clean Air Act (42 U. S. C. A. §§ 7401-7671q). The United States Environmental Protection Agency (EPA) is responsible for implementing the Clean Air Act (CAA), which was first enacted in 1970 and significantly amended in 1977 and 1990. The CAA effectively nationalized air pollution regulation, but delegates much authority for implementation to the states. The CAA sets forth National Ambient Air Quality Standards (NAAQS), which identify concentrations of "criteria" pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety, to protect human health and welfare. Section 7410 requires each state to adopt a State Implementation Plan, or SIP, which in turn set forth state-specific emission standards to "attain" compliance with the NAAQS. An area's air pollution levels are considered to be "in attainment" when they fall below the NAAQS levels.

State Regulations

California Health and Safety Code Sections 39000-4474 ("California Clean Air Act" or CCAA). The CCAA contains the state's air pollution control statutes, which in part set forth California's SIP. The SIP consists of attainment plans submitted by all local air districts in the state (air quality management districts and air pollution control districts). The California Air Resources Board (CARB) collects annual reports from the districts and formally designates each district as being in attainment or nonattainment for each criteria pollutant. The CARB is also tasked with identifying toxic air contaminants, adopting required control measures, and adopting monitoring and permit requirements. It has the ability to enforce violations via civil or criminal penalties.

Regional Regulations

2016 Air Quality Management Plan (**AQMP).** The South Coast Air Quality Management District (SCAQMD) has jurisdiction and regulatory authority within the South Coast Air Basin (SCAB), and is responsible for the region's AQMP, which sets forth regulations and various control measures to reduce air pollution and bring the region into compliance with CAA and CCAA standards by various target years. The SCAQMD monitors air quality at 38 locations throughout the Air Basin, and has enforcement authority over a four-county area (Los Angeles, Orange, Riverside and San Bernardino Counties). The SCAQMD is a commenting agency for land use projects subject to CEQA. See the SCAQMD website, *http://www.aqmd.gov/home* for comprehensive information regarding the AQMP and the SCAQMD's overall responsibilities.

The 2016 AQMP includes control measures for both stationary and mobile sources of air pollutants; the control measures are further codified into Rules or set forth as policies for jurisdictions within the Air Basin. Rules set specific limits for emissions from various stationary sources, including specific types of equipment, industrial processes, paints, solvents, and consumer products. Limits on airborne "fugitive" dust from construction and particulates from diesel engines are also set forth and enforced by the SCAQMD.

Violations of SCAQMD Rules are subject to abatement orders and civil and criminal penalties. Monetary penalties can range from $5,000 per day to $1,000,000 per day – the latter applies if willful and intentional emission of air contaminants causes great bodily injury or death (Cal. Health & Safety Code §§ 42402, 42402.1, 42402.2, 42402.3, 42402.4, and 42402.5).

Rules specific to development project construction and operation are included in Appendix D:

Rule 401, Visible Emissions. Rule 401, adopted in 1977 and last amended in 2001, prohibits anyone in the SCAB from discharging air contaminants from "any single source of emission" for a period of three minutes in any hour that is darker than a shade designated as No. 1 on the Ringelmann Smoke Chart (see U.S. Centers for Disease Control and Prevention (CDC), *Mining Publication, Ringelmann Smoke Chart*, available at *https://www.cdc.gov/ niosh/mining/works/coversheet114.html* (accessed March 15, 2021)). While there are qualified exceptions to this Rule for commercial char broilers, asphalt pavement heaters, abrasive blasting, agricultural operations, etc., the listed exemptions would not apply to this project. See SCAQMD Rule 401, available at *http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf?sfvrsn=4* (accessed March 15, 2021).

Rule 402, Nuisance. Rule 402, adopted in 1976, prohibits anyone from discharging air contaminants that "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." See SCAQMD Rule 401, available at *http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4* (accessed March 15, 2021).

Rule 403, Fugitive Dust. Rule 403, adopted in 1976 and last amended in 2005, applies to "any activity or man-made condition capable of generating fugitive dust" and defines fugitive dust as "any solid particulate matter that becomes airborne, other than that emitted from an exhaust stack, directly or indirectly as a result of the activities of any person." Numerous provisions address all aspects of demolition and construction activities. Particularly, any demolition or construction activity that generates fugitive dust, must apply one or more of the "best available control measures" listed in Rule 403 Table 1 to minimize dust emissions (SCAQMD Rule 403, available at *http://www.aqmd.gov/ docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4*, accessed March 15, 2021).

Rule 404, Particulate Matter, Concentration. Rule 404, adopted in 1976 and last amended in 1986, prohibits gaseous particulate matter discharge above listed concentrations at various discharge rates in Table 404(a) of the Rule.

Rule 405, Solid Particulate Matter, Weight. Rule 405, adopted in 1976 and last amended in 1986, prohibits solid particular matter discharge above listed rates in Table 405(a) of the Rule.

Rule 1110.2, Emissions from Gaseous and Liquid-Fueled Engines. Rule 1110.2, adopted in 1990 and last amended in 2019, applies to all stationary and portable engines over 50 rated brake horsepower (bhp), and is intended to reduce nitrogen oxides, volatile organic compounds, and carbon monoxide emissions. Section 1110.2(c)(16) defines non-road engines, such as those used in construction equipment. Section 1110.2(f)(2) sets requirements for recordkeeping for portable engine operators; records must be kept for a minimum of five years and must be made available for inspection by the SCAQMD. The intent of this Rule is to enforce and document compliance with emissions standards.

SCAQMD Air Quality Analysis for CEQA Documents. The SCAQMD has not issued an updated CEQA Air Quality Handbook since 1993, but offers various guidance documents and emissions-analysis models on its website. In 2002, the SCAQMD published guidance for analyzing cancer risks from diesel particulate matter from mobile sources at facilities such as truck stops and warehouse distribution centers (SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, available at *http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-*

toxics-analysis, accessed January 26, 2021). Health Risk Assessments (HRAs) use dispersion models to assess pollutant concentrations at various distances from stationary or mobile sources. The guidance document does not expressly *require* HRAs for warehouse facilities, but where operational details are known, an HRA should be performed to determine if there are identifiable cancer risks from the facility. Such details include: the facility's operating schedule; the number of trucks visiting the facility per day; the average idling time per truck; the number of refrigerated trucks using the facility; the number of diesel-fueled auxiliary power units operating per hour; the composite diesel particulate matter (DPM) emission factor in grams/mile, based on the project year and average vehicle speed; and average travel distances on and off-site.

Between 2002 and 2006, the SCAQMD developed localized significance thresholds (LST's) in response to Governing Board's Environmental Justice Enhancement Initiative I-4. Formally adopted in 2006, the LST methodology calculates PM2.5 and PM2.5 significance thresholds for projects five acres or less in area, and may be used in lieu of an HRA for those projects.

SCAQMD Significance Thresholds.

As of 2020, the South Coast Air Basin is considered to be in "non-attainment" for three criteria pollutants: ozone; particulate matter(PM10); and respirable particulate matter (PM2.5) (See SCAQMD National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), available at *http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14* (accessed January 26, 2021). To moderate the effects of public and private development projects on non-attainment, the SCAQMD sets regional and localized emissions significance thresholds for CEQA compliance for reactive organic gases/ozone precursors (ROG), carbon monoxide (CO), nitrogen oxides (NOx), PM10 and PM2.5 (see Tables AQ-1 and AQ-2 below for threshold values). Generally, if a project's construction and operational emissions do not exceed these thresholds, they are assumed to be "less-than-significant;" moreover, if the estimated emissions exceed thresholds but can be reduced to below thresholds by applying mitigation measures, emissions levels may be deemed less than significant with mitigation incorporated. SCAQMD thresholds are available at *http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf* (accessed January 26, 2021).

SCAQMD Localized Significance Thresholds. The local, or "localized," emissions thresholds (LSTs) represent the maximum NOx, CO, PM10 and PM2.5 emissions from a project that would not generally cause the federal or state ambient air quality standards to be exceeded in a smaller area than the entire South Coast air basin. They consider the ambient pollutant *concentrations* for 38 source receptor areas within the South Coast basin, and assign thresholds based on metric distances from the pollution source to the nearest sensitive receptor, e.g., 25m, 50m, 100m, 200m and 500m (82', 164', 328', 656', and 1640'). These thresholds apply only to projects that are five acres or less in area; larger projects may need to conduct a Health Risk Assessment to determine pollutant concentrations that arise from site construction or operation activity. Azusa is in Sensitive Receptor Area 9, East San Gabriel Valley. For additional information, see *http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds* (accessed January 26, 2021).

SCAG Participation in the AQMP. AQMP implementation also encompasses the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy and Transportation Control Measures (RTP/SCS). SCAG develops the RTP/SCS every four years. The RTP/SCS is a long-range regional transportation plan that provides for the development and integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG

region. The RTP/SCS also outlines land use growth strategies that provide for more integrated land use and transportation planning, and that maximize transportation investments to achieve the California Air Resources Board (CARB) regional greenhouse-gas (GHG)-reduction targets.

SCAG also develops the biennial Federal Transportation Improvement Program (FTIP). The FTIP is a multimodal program of capital improvement projects to be implemented over a six-year period. The FTIP implements the programs and projects in the RTP/SCS, which must be consistent with achieving air quality goals.

Regulated Air Pollutants

The U.S. EPA has established NAAQS for six common air pollutants: ozone (O_3), particulate matter (PM), which consists of "inhalable coarse" PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM_{10}) and "fine" PM (particles with an aerodynamic diameter smaller than 2.5 microns, or $PM_{2.5}$), CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. The U.S. EPA refers to these six common pollutants as "criteria" pollutants because the agency regulates the pollutants on the basis of human health and/or environmentally-based criteria.

CARB has established CAAQS for the six common air pollutants regulated by the federal CAA (the CAAQS are more stringent than the NAAQS) plus the following additional air pollutants: hydrogen sulfide (H_2S), sulfates (SO_X), vinyl chloride, and visibility reducing particles.

Common criteria air pollutants, such as ozone precursors, SO_2, and particulate matter, are emitted by a large number of sources and have effects on a regional basis (i.e., throughout the Basin); other pollutants, such as HAPs, TACs, and fugitive dust, are generally not as prevalent and/or emitted by fewer and more specific sources. As such, the criteria pollutants have much greater effects on local air quality conditions and local receptors.

A brief description of the seven federal criteria air pollutants and four additional state-regulated air pollutants for which ambient air quality standards have been developed by the U.S. EPA and/or CARB is provided below.[1]

- **Ground-level Ozone**, or smog, is not emitted directly into the atmosphere. It is created from chemical reactions between NO_X and volatile organic compounds (VOCs)(also called Reactive Organic Gases (ROG)), in the presence of sunlight. Thus, ozone formation is typically highest on hot sunny days in urban areas with NO_X and ROG pollution. Ozone irritates the nose, throat, and air pathways and can cause or aggravate shortness of breath, coughing, asthma attacks, and lung diseases such as emphysema and bronchitis.
- **VOC** is a U.S. EPA term defined as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. The term exempts organic compounds of carbon which have been determined to have negligible photochemical reactivity such as: methane, ethane, and methylene chloride.

[1] Definitions originate from U. S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). For general information about air pollutants and their effects on human health, see U.S. EPA, Air Topics, available at https://www.epa.gov/environmental-topics/air-topics, California Air Resources Board, Common Air Pollutants, available at https://ww2.arb.ca.gov/resources/common-air-pollutants (both accessed January 26, 2021).

- **ROG** is a CARB term defined as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, and includes several low-reactive organic compounds which have been exempted by the U.S. EPA VOC.
- **Particulate Matter**, also known as particle pollution, is a mixture of extremely small solid and liquid particles made up of a variety of components such as organic chemicals, metals, and soil and dust particles. Particulate matter emanating from diesel engines is abbreviated as "DPM" and is described below.
    - **PM_{10}**, also known as inhalable coarse, respirable, or suspended PM_{10}, consists of particles less than or equal to 10 micrometers in diameter (approximately $1/7^{th}$ the thickness of a human hair). These particles can be inhaled deep into the lungs and possibly enter the blood stream, causing health effects that include, but are not limited to, increased respiratory symptoms (e.g., irritation, coughing), decreased lung capacity, aggravated asthma, irregular heartbeats, heart attacks, and premature death in people with heart or lung disease.
    - **$PM_{2.5}$**, also known as fine PM, consists of particles less than or equal to 2.5 micrometers in diameter (approximately $1/30^{th}$ the thickness of a human hair). These particles pose an increased risk because they can penetrate the deepest parts of the lung, leading to and exacerbating heart and lung health effects.
- **Carbon Monoxide (CO)** is an odorless, colorless gas that is formed by the incomplete combustion of fuels. Motor vehicles are the single largest source of carbon monoxide in the Bay Area. At high concentrations, CO reduces the oxygen-carrying capacity of the blood and can aggravate cardiovascular disease and cause headaches, dizziness, unconsciousness, and death.
- **Nitrogen Dioxide (NO_2)** is a by-product of combustion. NO_2 is not directly emitted, but is formed through a reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to ozone formation. NO_2 also contributes to the formation of particulate matter. NO_2 can cause breathing difficulties at high concentrations.
- **Sulfur Dioxide (SO_2)** is one of a group of highly reactive gases known as SO_X. Fossil fuel combustion in power plants and industrial facilities are the largest emitters of SO_2. Short-term effects of SO_2 exposure can include adverse respiratory effects such as asthma symptoms. SO_2 and other SO_X can react to form PM.
- **Sulfates (SO_4^{2-})** are the fully oxidized ionic form of sulfur. SO_4^{2-} are primarily produced from fuel combustion. Sulfur compounds in the fuel are oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Sulfate exposure can increase risks of respiratory disease.
- **Lead** is a metal found naturally in the environment as well as in manufactured products. Mobile sources used to be the main contributor to ambient lead concentrations in the air. In the early 1970s, the U.S. EPA established national regulations to gradually reduce the lead content in gasoline, and in 1996, lead was banned from gasoline. As a result of these efforts, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically. Lead can adversely affect multiple organ systems of the body and people of every age group. Lead poisoning in young children can cause brain damage,

behavioral problems, and liver or kidney damage. Lead poisoning to adults can cause reproductive problems, muscle and joint pain, nerve disorders and kidney disease.

- **Visibility Reducing Particles** are PM that vary greatly in shape, size, and chemical composition and which impact the environment by causing haze and thus decreasing visibility. These particulates come from a variety of natural and manmade sources and can be made up of many different materials such as metals, soot, soil, dust, and salt. The statewide standard for visibility-reducing particle is to limit the effects on public welfare. Health effects are associated with PM_{10} and $PM_{2.5}$, which are a component of visibility reducing particles.

Toxic Air Contaminants (TACs)

In addition to criteria air pollutants, the U.S. EPA and CARB have classified certain pollutants as hazardous air pollutants (HAPs) or toxic air contaminants (TACs), respectively. These pollutants can cause severe health effects at very low concentrations, and many are suspected or confirmed carcinogens. The U.S. EPA has identified 187 HAPs, including such substances as benzene and formaldehyde; CARB also considers particulate emissions from diesel-fueled engines and other substances to be TACs. Since the CARB's list of TACs references and includes U.S. EPA's list of HAPs, this EIR uses the term TAC when referring to HAPs and TACs.

- **Diesel Particulate Matter (DPM)**. Diesel engines emit both gaseous and solid material, the solid material is known as DPM. Almost all DPM is less than 1 µm in diameter, and thus is a subset of $PM_{2.5}$. DPM is typically composed of carbon particles and numerous organic compounds. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen. The primary sources of diesel emissions are ships, trains, trucks, rail yards and heavily traveled roadways. These sources are often located near highly populated areas, resulting in greater DPM related health consequences in urban areas. In Azusa, this includes the I-210, I-605, the Southern Pacific railroad along to the City's western border, nonroad equipment operating in quarries and the Azusa Landfill, and trucks accessing industrial and commercial businesses in the City.

  The majority of DPM is small enough to be inhaled into the lungs and what particles are not exhaled can be deposited on the lung surface and in the deepest regions of the lungs where the lung is most susceptible to injury. In 1998, CARB identified DPM as a toxic air contaminant based on evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure.

- **Toxic compounds and pollutants.** Other toxic compounds, such as butadiene, benzene, perchloroethylene, formaldehyde, acetaldehyde, arsenic, cadmium, lead, are found in the Basin. Many toxins, such as benzene, butadiene, and lead, are associated with refinery operations such as those that exist in the Basin.

Ambient Air Quality Standards and Basin Attainment Status

In general, the NAAQS and CAAQS define "clean" air, and are established at levels designed to protect the health of the most sensitive groups in our communities by defining the maximum amount of a pollutant (averaged over a specified period of time) that can be present in outdoor air without any harmful effects on people or the environment. Air pollutant levels are typically described in terms of concentration, which refers to the amount of pollutant material per volumetric unit of air. Concentrations are typically measured in parts per billion (ppb),

parts per million (ppm), or micrograms per cubic meter ($\mu g/m^3$). With respect to air pollution measurement, "ambient" means the air conditions (temperature, barometric pressure, humidity, etc.) that exist in the vicinity of the monitoring device.

The U.S. EPA, CARB, and regional air agencies assess the air quality of an area by measuring and monitoring pollutant concentration in the ambient air and comparing pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into one of the following categories.

- **Attainment**. A region is "in attainment" if monitoring shows ambient concentrations of a specific pollutant are less than or equal to the NAAQS or CAAQS. In addition, an area that has been re-designated from nonattainment to attainment is classified as a "maintenance area" for 10 years to ensure that the air quality improvements are sustained.
- **Nonattainment.** If the NAAQS or CAAQS are exceeded for a pollutant, the region is designated as nonattainment for that pollutant. It is important to note that some NAAQS and CAAQS require multiple exceedances of the standard in order for a region to be classified as nonattainment. Federal and state laws require nonattainment areas to develop strategies, implementation plans, and control measures to reduce pollutant concentrations to levels that meet, or attain, standards.
- **Unclassified.** An area is unclassified if the ambient air monitoring data are incomplete and do not support a designation of attainment or nonattainment.

Table AQ-1 lists the NAAQS and CAAQS and summarizes the Basin's attainment status. Table AQ-2 lists the emissions recorded from 2014 to 2019 at the SCAQMD East San Gabriel Valley Monitoring Station.

Table AQ-1 Ambient Air Quality Standards and Basin Attainment Status

Pollutant	Averaging Time[b]	California Standards[a]		National Standards[a]	
		Standard[c]	Attainment Status	Standard[c]	Attainment Status
Ozone	1-Hour (1979)	--	--	0.12 ppm	Nonattainment
	1-Hour (Current)	0.09 ppm	Nonattainment	--	--
	8-Hour (1997)	--	--	0.08 ppm	Nonattainment
	8-Hour (2008)	--	--	0.075 ppm	Nonattainment
	8-Hour (Current)	0.070 ppm	Nonattainment	0.070 ppm	Nonattainment
PM_{10}	24-Hour	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
	Annual Average	20 µg/m^3	Nonattainment	--	--
$PM_{2.5}$	24-Hour	--	--	35 µg/m^3	Nonattainment
	Annual Average (1997)	--	--	15 µg/m^3	Nonattainment
	Annual Average (Current)	12 µg/m^3	Nonattainment	12 µg/m^3	Nonattainment
	8-Hour	10,000 µg/m^3	Attainment	10,000 µg/m^3	Attainment
Nitrogen Dioxide	1-Hour	0.18 ppm	Attainment	0.10 ppm	Unclassifiable/ Attainment
	Annual Average	0.03 ppm	Attainment	0.053 ppm	Attainment
Sulfur Dioxide	1-Hour	--	--	75 ppb	Attainment
	24-Hour	--	--	0.14 ppm	Unclassifiable/ Attainment
	Annual Average	--	--	0.03 ppm	Unclassifiable/ Attainment
Lead	3-Months Rolling	--	--	0.15 µg/m^3	Nonattainment (Partial)
Hydrogen Sulfide	1-Hour	0.03 ppm	Attainment	--	
Sulfates	24-Hour	25 µg/m^3	Attainment	--	
Vinyl Chloride	24-Hour	0.01 ppm	Attainment	--	

Sources: CARB, *Ambient Air Quality Standards*, available at https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf (accessed 1/26/21); SCAQMD, *National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for the South Coast Air Basin*, available at https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2 , and U.S. EPA, *Basic Information About Air Emissions Monitoring*, available at https://www.epa.gov/air-emissions-monitoring-knowledge-base/basic-information-about-air-emissions-monitoring (accessed 1/26/21)s

a. This table summarizes the CAAQS and NAAQS and the Basin's attainment status (as of September 2018). This table does not provide comprehensive information regarding the CAAQS and NAAQS. Each CAAQS and NAAQS has its own averaging time, standard unit of measurement, measurement method, and statistical test for determining if a specific standard has been exceeded. Standards are not presented for visibility-reducing particles, which are not concentration-based. The Basin is unclassified for visibility-reducing particles.

b. Averaging time represents the period over which data are averaged and used to verify proper operation of the pollution control approach or compliance with the emissions limitation or standard. Examples of averaging time include a 3-hour average in units of the emissions limitation, a 30-day rolling average emissions value, a daily average of control device operational parametric range, and an instantaneous alarm.

c. Standards are shown in terms of parts-per-million (ppm), parts per billion (ppb) or micrograms per cubic meter (µg/m3) rounded to the nearest whole number for comparison purposes (with the exception of lead, which has a standard less than 1 µg/m3).

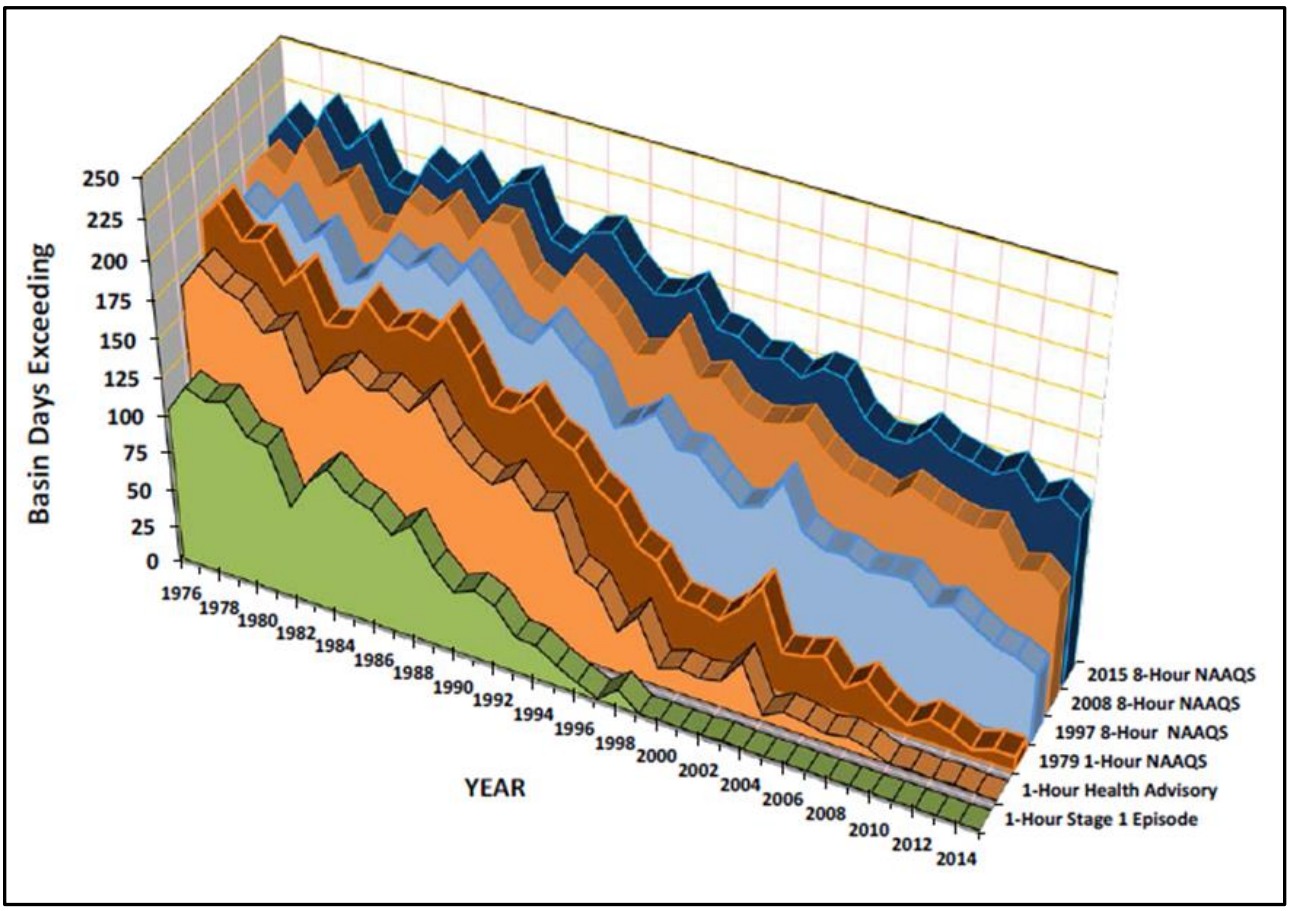
Regional Air Quality Improvement

As described above, the SCAQMD is the lead agency charged with regulating air quality emission reductions for the entire Basin. SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in Basin air quality.

The remarkable historical improvement since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs and by utilizing uniform CEQA review throughout the Basin. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the Basin. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the State level by CARB.

Substantial progress has been made since the 1970s in reducing ozone and PM emission through regulatory measures, voluntary actions, and partnerships with the SCAQMD, other agencies, and stakeholders. Ozone, NO_X, VOC, and CO have been decreasing in the Basin since 1975 and are projected to continue to decrease through 2030. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled in the Basin continue to increase, NO_X and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy.

Despite large advances in technological improvements, the Basin still struggles with attainment of some criteria air pollutants, especially ozone. In 2015 the Basin's maximum ozone concentrations continued to exceed federal standards. Figure 21 shows the trend from 1976 through 2015 of the annual number of Basin days exceeding various metrics for ozone. Although trends show significant improvements achieved over the last 30 years, continued efforts are necessary to meet all the 8-hour ozone standards and the 1979 1-hour standard.

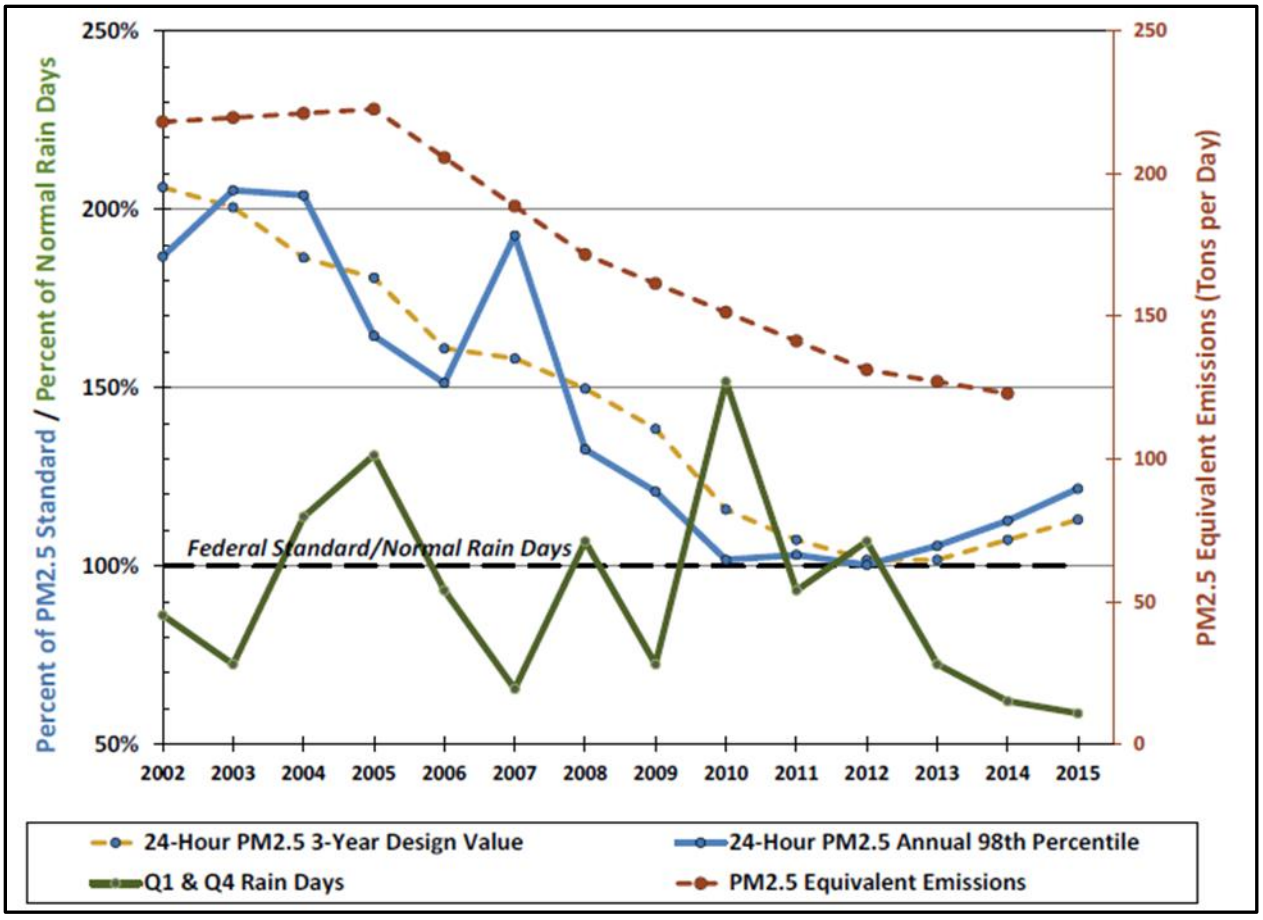


Source: SCAQMD 2016 AQMP, Figure 2-3, available at http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/chapter2.pdf?sfvrsn=4 (accessed January 26, 2021).

Figure 21 1976-2015: Trend of Number of Basin Days Exceeding Current and Former Ozone NAAQS and 1-Hour Ozone Episode Levels

Drought conditions have persisted in Southern California and the southwestern United States, negatively affecting air quality in many areas. The low amount of rainfall frequency leads to less washing of road surfaces and brings drier ground surfaces. This reduces the natural crusting of soils, and in turn leads to enhanced resuspension of fugitive dust by moving vehicles and winds. More importantly, ongoing drought conditions reduce the natural air pollution-cleansing effect precipitation provides due to washout (i.e., particulate matter and its precursors are captured and removed by raindrops).

PM2.5 equivalent emissions continued to decrease from 2002 to 2012 due to continued implementation of PM2.5-related emission reductions in the Basin. Although the reductions associated with PM2.5 related control strategies continue to assist the SCAQMD in its goal to return the Basin to attainment status, emissions have steadily been on the rise since 2012 due to the severe rainfall deficit. Figure 22 below shows the PM2.5 design values, the 98th percentile 24-hour PM2.5 concentrations, and percent of normal rain days in a calendar year.



Source: SCAQMD 2016 AQMP, Figure 2-9, available at http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/chapter2.pdf?sfvrsn=4 (accessed January 26, 2021).

Figure 22 PM2.5 Design Values, 98th Percentile 24-Hr. Concentrations, Percent of Normal Rain Days

Local Air Quality Conditions

The Project site is located in SCAQMD Source Receptor Area (SRA) 9 (East San Gabriel Valley). The closest air quality monitoring station to the project site is the East San Gabriel Station 1 (Azusa, no. 060), located at 803 N. Loren Avenue (approximately 1.6 miles north-northwest of the site. This station monitors O_3, CO, NO_2, total hydrocarbons, total non-methane hydrocarbons, PM10, PM2.5 and sulfates. Lead is not measured at the Azusa Station. The most recent data available from the Azusa No. 060 monitoring station is provided in Table AQ-3 below.

Table AQ-2 Local Air Quality Conditions, E. San Gabriel Valley Station 60

Pollutant	Ambient Air Standard	2014	2015	2016	2017	2018	2019
Ozone (O3)							
Maximum 1-hour Concentration (ppm)		0.123	0.122	0.146	0.152	0.139	0.123
Maximum 8-hr Concentration (ppm)		0.092	0.096	0.106	0.114	0.099	0.094
Number of Days Exceeding State 1-hr Standard	>0.09 ppm	11	21	30	38	24	34
Number of Days Exceeding State 8-hr Standard	>0.07 ppm	20	28	40	62	42	39
Days Exceeding Federal 1-hr Standard	>0.124 ppm	0	0	4	7	3	0
Days Exceeding Federal 8-hr Standard	>0.070 ppm	18	27	39	62	42	39
Carbon Monoxide (CO)							
Maximum 1-hr Concentration (ppm)		2	2.1	1.3	1.8	1.4	1.6
Maximum 8-hr Concentration (ppm)		1.9	1.3	1.2	0.9	1.0	1.1
Days Exceeding State 1-hr Standard	>20,084 ppm	0	0	0	0	0	0
Days Exceeding Federal/State 8-hr Standard	>8,732 ppm	0	0	0	0	0	0
Days Exceeding Federal 1-hr Standard	>34,929 ppm	0	0	0	0	0	0
Nitrogen Dioxide (NO2)							
Maximum 1-hr Concentration (ppb)		70.2	71.0	74.2	65.6	70.8	59.7
Annual Arithmetic Mean Concentration (ppb)		17.8	15.4	16.6	15.8	14.9	13.7
Days Exceeding State 1-hr Standard	>20 ppm	0	0	0	0	0	0
Particulate Matter (PM10)							
Maximum 24-hr Concentration (µg/m3)		96	101	74	83	78	82
Annual Arithmetic Mean (µg/m3)		44.1	37.1	33.7	31.4	32.2	28.1
Samples Exceeding Federal 24-hr Standard	>150 µg/m3	0	0	0	0	0	0
Samples Exceeding State 24-hr Standard	>50 µg/m3	22	12	12	6	10	4
Particulate Matter (PM2.5)							
Maximum 24-hr Concentration (µg/m3)		32.4	44.3	32.17	24.9	30.20	28.3
Annual Arithmetic Mean (µg/m3)		11.63	9.4	10.15	10.42	10.35	9.18
Samples Exceeding Federal 24-hr Standard	>35 µg/m3	0	1	0	0	0	0

Source: SCAQMD, Historical Data By Year, available at http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year (accessed January 26, 2021).

City Regulations

City of Azusa General Plan. The Azusa General Plan, Natural Environment Element (April 2004), sets forth City goals and policies for reducing air pollutant emissions in the City, and improving overall air quality. The applicable air quality-related policies include, but are not limited to, the following:

Goal 1 – Improve air quality in Azusa and reduce exposure to air pollutants.

Policy 1.1: Integrate air quality concerns into land use planning decisions.

Policy 1.2: Integrate air quality concerns into site design review.

Policy 1.3: Reduce pollutant emissions from quarry operations, off -road vehicle use areas, industrial uses, and vehicular traffic.

Policy 1.4: Participate in regional air quality planning strategies.

Policy 1.5: Consider encouraging the use of "green roof" construction technologies.

5.2.3 CEQA Significance Criteria

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the CEQA Guidelines, as amended, and used by the City in its environmental review process. The Initial Study Checklist includes questions relating to air quality. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)
- Expose sensitive receptors to substantial pollutant concentrations ; and/or
- Create objectionable odors affecting a substantial number of people.

Based on these significance thresholds and criteria, the Project's effects have been categorized as either "no impact," a "less than significant impact," "less-than-significant impact with incorporation of mitigation measures," and a "significant and unavoidable impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less-than-significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

5.2.4 Impact Analysis

AQ-1 Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact with Mitigation Incorporated. As explained below, the proposed project is not anticipated to conflict with or to obstruct implementation of the 2016 AQMP (the applicable air quality plan for the SCAB, described above). Generally, a conflict with or obstruction of an air quality plan would be created by a project's inability – or refusal – to comply with the plan's requirements and/or specific Rules that contribute toward implementing that plan. In this case, the proposed project's construction and operational phases will be *required* to comply with SCAQMD Rules and emissions thresholds; if violations are reported and recognized during either phase of development, the project would be susceptible to stop-work orders and substantial fines. Essentially, the project would not be permitted to proceed unless construction complied with SCAQMD Rules. Moreover, such compliance is a customary business practice, as the Rules have been in effect for decades.

Specifically, project construction would be required to implement the SCAQMD Rules described above, including: Rule 401, which prohibits generation of visible emissions beyond a prescribed opacity; Rule 402, which prohibits nuisance emissions from any source; Rule 403, which requires control of fugitive dust by various "best available control measures," Rule 404, which limits gaseous particulate matter discharge at particular concentrations, Rule 405, which limits solid particulate matter discharge, and Rule 1110.2, which regulates emissions from stationary and portable engines.

However, as described in section AQ-2 below, emissions estimates for the project construction and operational phases are likely to exceed established SCAQMD significance thresholds, and thus interfere with AQMP objectives. Accordingly, the project would be subject to emissions-reducing mitigation measures. Mitigation Measures AQ-1 through AQ-5 below would maintain emissions below significance thresholds for both construction and operation.

The project is not anticipated to conflict with the City of Azusa General Plan's Policy 1.3, *Reduce pollutant emissions from quarry operations, off-road vehicle-use areas, industrial uses, and vehicular traffic*, because it will be required to reduce emissions in compliance with SCAQMD Rules, and to conduct construction and operations in accordance with this document's mitigation measures, which further reduce the project's emissions.

AQ-2 Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact with Mitigation Incorporated. Project demolition and construction work would generate air pollutants from equipment/vehicle exhaust, paint, solvents, and dust, including the criteria pollutants listed in the Background section above, specifically particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$) and ozone (O_3). Heavy equipment would generate carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NOx), and sulfur dioxide (SO_2). Project operational air pollutants would be generated directly from passenger vehicles and freight trucks, and indirectly from building heating, cooling, and periodic re-application of structure and parking lot coatings. As discussed below and illustrated in Tables AQ-3 through AQ-6, the project's emissions, when mitigated, are estimated to be below both local and regional significance thresholds and are not expected to result in a cumulatively considerable net increase of any criteria pollutant.

The project's construction (including demolition) and operational-phase air pollutants were estimated using the *California Emissions Estimator Model (CalEEMod) (version 2016.3.2)*, available at *http://caleemod.com/* (accessed January 26, 2021). CalEEMod is designed to provide a uniform platform for government agencies, land-use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user. The model incorporates average emissions for specific land uses such as that proposed by the project.

The CalEEMod output tables are included in Appendix A of this EIR and the model results are summarized in Tables AQ-3 through AQ-6. The model estimates ROG, NOx, CO, SO2, PM10 and PM2.5, as well as CO2 emissions for greenhouse-gas impact analysis. Note that the model does not quantify ozone emissions, because ozone is generated photochemically in the atmosphere by sunlight reacting with chemicals that react together to form ozone – ozone *precursors* – such as reactive organic gases/volatile organic compounds (ROG/VOC) and oxides of nitrogen, and varies with air temperature and available light (See U.S. Environmental Protection Agency, AirNow, *Ground Level Ozone Pollution,*

https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#formation, (accessed January 26, 2021)).

CalEEMod offers several industrial land-use data-entry choices, which are correlated with average daily vehicle trip data from the Institute of Transportation Engineers Trip Generation Manual, 9th edition (*see* CalEEMod, Appendix A, *Calculation Details for CalEEMod*, fn 18, p. 20, available at *http://caleemod.com/*, accessed January 26, 2021). Rates associated with non-refrigerated warehouses without a railroad spur were used as the principal land use, with parking as a secondary land use.

Construction was estimated to span from 2021 into 2022, separated into three general phases: building construction, paving and architectural coatings (painting). Each phase would use different construction equipment, at rates derived from statewide construction averages. Existing regulations as described above would apply to project construction, including dust-control measures and compliance with the California Building Code (Title 24) energy-consumption and water-use limitations.

As illustrated in Tables AQ-3 and AQ-5 below, construction and operational PM emissions exceeded localized significance thresholds for maximum daily emissions. Tables AQ-4 and AQ-6 show emissions estimates after mitigation.

Mitigation measures incorporated into the CalEEMod data entry included using EPA-certified Tier IV engines for all construction equipment, using low-VOC architectural coatings, low-flow plumbing fixtures and water-conserving landscape irrigation. Incorporation of these mitigation measures decreased all emissions to less than significant levels. Significantly, use of emission-controlling engines decreased particulate emissions from construction to approximately half of the LSTs at 25 meters (82 feet) from the project boundary. Operational emissions, which incorporated projected truck trips associated with non-refrigerated warehouses, did not exceed the LSTs at 25 meters. Specific mitigation measures are set forth below.

Table AQ-3 Estimated Unmitigated Construction Emissions

		ROG (VOC)	NOX	CO	SO2	Total PM10	Total PM2.5
Year		**lbs./day**					
2021 Summer		3.97	44.16	23.04	0.09	20.31	11.87
2022 Summer		50.89	17.90	19.11	0.04	1.62	0.99
Maximum Daily Emissions, Summer		**50.89**	**44.16**	**23.04**	**0.09**	**20.31**	**11.87**
2021 Winter		3.97	44.40	23.04	0.09	20.31	11.87
2020 Winter		50.90	17.91	18.98	0.04	1.63	0.99
Maximum Daily Emissions, Winter		**50.90**	**44.40**	**23.04**	**0.09**	**20.31**	**11.87**
SCAQMD Threshold[a]		**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds (LSTs)[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, in meters)	25m	N/A	**203**	**1733**	N/A	**14**	**8**
	50m	N/A	**227**	**2299**	N/A	**43**	**11**
	100m	N/A	**286**	**3680**	N/A	**63**	17
	200m	N/A	**368**	**7600**	N/A	**105**	**35**
	500m	N/A	**584**	**25,558**	N/A	**229**	**116**
Exceeds Thresholds?		**N/A**	**NO**	**NO**	**N/A**	**YES, 25m**	**YES, 50m**

[a] South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, available at *http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2* *(accessed* January 4, 2021).

[b] South Coast Air Quality Management District, *Localized Significance Thresholds,* available at *http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds* (accessed January 4, 2021)

Table AQ-4 Estimated Mitigated Construction Emissions

		ROG (VOC)	NOX	CO	SO2	Total PM10	Total PM2.5
Year		**lbs./day**					
2021 Summer		1.03	20.00	24.76	0.09	8.39	4.59
2022 Summer		50.72	4.52	20.21	0.04	0.86	0.27
Maximum Daily Emissions, Summer		**50.72**	**20.00**	**24.76**	**0.09**	**8.39**	**4.59**
2021 Winter		1.05	21.24	24.76	0.09	8.39	4.59
2020 Winter		50.72	4.53	20.07	0.04	0.86	0.27
Maximum Daily Emissions, Winter		**50.72**	**21.24**	**24.76**	**0.09**	**8.39**	**4.59**
SCAQMD Threshold[a]		**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds (LSTs)[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, in meters)	25m	N/A	**203**	**1733**	N/A	**14**	**8**
	50m	N/A	**227**	**2299**	N/A	**43**	**11**
	100m	N/A	**286**	**3680**	N/A	**63**	**17**
	200m	N/A	**368**	**7600**	N/A	**105**	**35**
	500m	N/A	**584**	**25,558**	N/A	**229**	**116**
Exceeds Thresholds?		**N/A**	**NO**	**NO**	**N/A**	**NO**	**NO**

[a] South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, available at *http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2* (accessed January 4, 2021).

[b] South Coast Air Quality Management District, Localized Significance Thresholds, available at *http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds* (accessed January 4, 2021).

Table AQ-5 Estimated Unmitigated Operational Emissions

		ROG (VOC)	NOX	CO	SO2	Total PM10	Total PM2.5
SUMMER		**lbs./day**					
Category							
Area		2.19	1.30e-004	0.01	0.00	5.00e-005	5.00e-005
Energy		2.49e-003	0.02	0.02	1.40e-004	1.72e-003	1.72e-003
Mobile		0.35	1.75	5.36	0.02	1.66	0.45
Total		**2.54**	**1.77**	**5.39**	**0.02**	**1.66**	**0.46**
SCAQMD Threshold[a]		**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds (LSTs)[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, meters)	25m	N/A	203	1733	N/A	4	2
	50m	N/A	227	2299	N/A	11	3
	100m	N/A	286	3680	N/A	16	5
	200m	N/A	368	7600	N/A	26	9
	500m	N/A	584	25,558	N/A	55	28
Exceeds Threshold?		**N/A**	**NO**	**NO**	**N/A**	**NO**	**NO**
WINTER		**lbs./day**					
Category							
Area		2.19	1.30e-004	0.01	0.00	5.00e-005	5.00e-005
Energy		2.49e-003	0.02	0.02	1.40e-004	1.72e-003	1.72e-003
Mobile		0.34	1.80	5.03	0.02	1.66	0.45
Total		**2.53**	**1.83**	**5.06**	**0.02**	**1.66**	**0.46**
SCAQMD Threshold[a]		**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, meters)	25m	N/A	203	1733	N/A	4	2
	50m	N/A	227	2299	N/A	11	3
	100m	N/A	286	3680	N/A	16	5
	200m	N/A	368	7600	N/A	26	9
	500m	N/A	584	25,558	N/A	55	28
Exceeds Threshold?		N/A	NO	NO	N/A	NO	NO

[a] South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, available at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 (accessed January 4, 2021).

[b] South Coast Air Quality Management District, Localized Significance Thresholds, available at http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds (accessed January 4, 2021).

Table AQ-6 Estimated Mitigated Operational Emissions

		ROG (VOC)	NOX	CO	SO2	Total PM10	Total PM2.5
SUMMER		**lbs./day**					
Category							
Area		2.06	1.30e-004	0.01	0.00	5.00e-005	5.00e-005
Energy		2.49e-003	0.02	0.02	1.40e-004	1.72e-003	1.72e-003
Mobile		0.35	1.75	5.36	0.02	1.66	0.45
Total		**2.42**	**1.77**	**5.39**	**0.02**	**1.66**	**0.46**
SCAQMD Thresholda		**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds (LSTs)[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, meters)	25m	N/A	203	1733	N/A	4	2
	50m	N/A	227	2299	N/A	11	3
	100m	N/A	286	3680	N/A	16	5
	200m	N/A	368	7600	N/A	26	9
	500m	N/A	584	25,558	N/A	55	28
Exceeds Threshold?		**N/A**	**NO**	**NO**	**N/A**	**NO**	**NO**
WINTER		**lbs./day**					
Category							
Area		2.06	1.30e-004	0.01	0.00	5.00e-005	5.00e-005
Energy		2.49e-003	0.02	0.02	1.40e-004	1.72e-003	1.72e-003
Mobile		0.34	1.80	5.03	0.02	1.66	0.45
Total		**2.41**	**1.83**	**5.06**	**0.02**	**1.66**	**0.46**
SCAQMD Threshold[a]		**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?		**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
SCAQMD Local Significance Thresholds[b] (Localized Source Receptor Zone 9, E. San Gabriel Valley, receptor distances from 5-acre site boundary, meters)	25m	**N/A**	**203**	**1733**	**N/A**	**4**	**2**
	50m	**N/A**	**227**	**2299**	**N/A**	**11**	**3**
	100m	**N/A**	**286**	**3680**	**N/A**	**16**	**5**
	200m	**N/A**	**368**	**7600**	**N/A**	**26**	**9**
	500m	**N/A**	**584**	**25,558**	**N/A**	**55**	**28**
Exceeds Threshold?		**N/A**	**NO**	**NO**	**N/A**	**NO**	**NO**

[a] South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, available at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 (accessed January 4, 2021).

[b] South Coast Air Quality Management District, Localized Significance Thresholds, available at http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds (accessed January 4, 2021).

AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Significant and Unavoidable. Both project construction and operation would generate ozone precursors (ROG/VOC and NOx), PM_{10}, and $PM_{2.5}$; the South Coast Air Basin is in non-attainment for these pollutants (see Table AQ-1). The 2016 AQMP notes that further control of ozone precursors is required to attain both ozone and PM standards (SCAQMD, *Final 2016 AQMP*, p. 2-43, available at *http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/chapter2.pdf?sfvrsn=4* (accessed February 3, 2021). As discussed below, project-specific ozone precursors and particulate matter emissions can be mitigated to below project-level significance thresholds. However, the SCAQMD has not set a standard for determining the *cumulative* significance of a project's emissions. Since the South Coast Air Basin is in non-attainment for ozone precursors and PM, *any* addition to those emissions could be deemed cumulatively significant. Moreover, the General Plan determined that PM emissions associated with Plan implementation constituted a significant unavoidable adverse impact (GPDEIR, p. 4.3-15). Thus, with the proposed project and other projects within the City and region, cumulative impacts would remain significant and unavoidable.

Tables AQ-3 and AQ-5 show unmitigated construction and operational emissions, and Tables AQ-4 and AQ-6 show mitigated emissions.

Ozone Precursors

Maximum unmitigated construction ROG/VOC emissions are estimated to be approximately 50.90 lbs. per day, 24.11 lbs. per day (32%) less than the 75 lb. per day threshold. Mitigated construction ROG/VOC emissions are estimated to be slightly less, 50.72 lbs. per day, 24.28 lbs. per day (32%) less than the threshold. Maximum unmitigated operational emissions are estimated to be 2.54 lbs. per day, 52.46 lbs. per day (95%) less than the 55 lbs. per day threshold. Mitigated operational emissions are estimated to be 2.42 lbs. per day, 52.58 lbs. per day (96%) less than the threshold.

Maximum unmitigated construction NOx emissions are estimated to be substantially lower than the SCAQMD thresholds of 100 lbs. per day: approximately 44.40 lbs. per day, 55.60 lbs. per day (56%) less than the threshold; mitigated construction NOx emissions are estimated to be approximately 21.24 lbs. per day, 78.76 lbs. per day (79%) less than the threshold. Maximum unmitigated operational NOx emissions are 1.83 lbs. per day, 53.17 lbs. per day (97%) less than the 55 lbs. per day threshold; estimated "mitigated" operational NOx emissions did not change by applying feasible CalEEMod mitigation measures. However, although these emissions are substantially lower than applicable thresholds, because they add to the regional load, mitigation remains necessary. Measures not included in the CalEEMod input selections, such as reducing or eliminating truck idling at the warehouse would further reduce operational ROG/VOC emissions. Mitigation Measure AQ-4 requires signs to be posted at the project's entrances and at all loading docks that require engines to be shut down while trucks are stationary, and that include appropriate information for contacting City Code Enforcement (telephone numbers, URLs, QR codes, etc.)

Particulate Matter

PM_{10}. Maximum unmitigated construction PM10 emissions are estimated to be approximately 20.31 lbs. per day, 129.69 lbs. per day (86%) less than the 150 lb. per day threshold. Mitigated construction PM10 emissions are estimated to be substantially less, 8.39 lbs. per day, 141.61 lbs. per day (94%) less than the threshold. Maximum unmitigated operational emissions are estimated to be 1.66 lbs. per day, 148.34 lbs. per day (99%) less than the 150 lbs. per day threshold. Mitigated operational emissions are estimated to be 1.66 lbs. per day, also 148.34 lbs. per day (99%) less than the threshold.

$PM_{2.5}$. Maximum unmitigated construction $PM_{2.5}$ emissions are estimated to be approximately 11.87 lbs. per day, 43.13 lbs. per day (79%) less than the 55 lb. per day threshold. Mitigated construction $PM_{2.5}$ emissions are estimated to be substantially less, 4.59 lbs. per day, 50.41 lbs. per day (92%) less than the threshold. Maximum unmitigated operational emissions are estimated to be 0.46 lbs. per day, 54.54 lbs. per day (99%) less than the 55 lbs. per day threshold. Mitigated operational emissions are also estimated to be 0.46 lbs. per day, 54.54 lbs. per day (99%) less than the threshold.

CalEEMod mitigation measures applied included using EPA Tier 4 Final engines in all off-road equipment used in construction, watering any exposed soil twice a day (a BMP contained in Rule 403), requiring low-VOC architectural coatings, requiring high-efficiency lighting throughout, requiring low-flow plumbing fixtures, and requiring water-conserving landscape materials and irrigation. Application of these measures substantially reduced estimated construction emissions, but had little effect on operational emissions. The additional mitigation measure, minimizing on-site vehicle idling, would reduce operational emissions. On-site signage as described above would instruct truck drivers and management personnel and encourage compliance. Mitigation Measures AQ-1 through AQ-5 require these measures, and are enforceable by City Code Enforcement.

Cumulatively Considerable Net Increase of Criteria Pollutants. The proposed project would measurably add to the existing pollutant load in the East San Gabriel Valley, particularly with respect to ozone precursors. Table AQ-2 shows that the area's ozone levels have exceeded both state and federal standards up to 62 days per year within the past seven years. Even though project-related mitigated ozone precursor emissions are estimated to be substantially below significance thresholds, *any* additional emissions added by the project to the basin would exacerbate existing conditions, albeit fractionally, and could be "cumulatively considerable" when combined with other projects in Azusa and neighboring cities. Accordingly, this impact must be considered **"significant and unavoidable."**

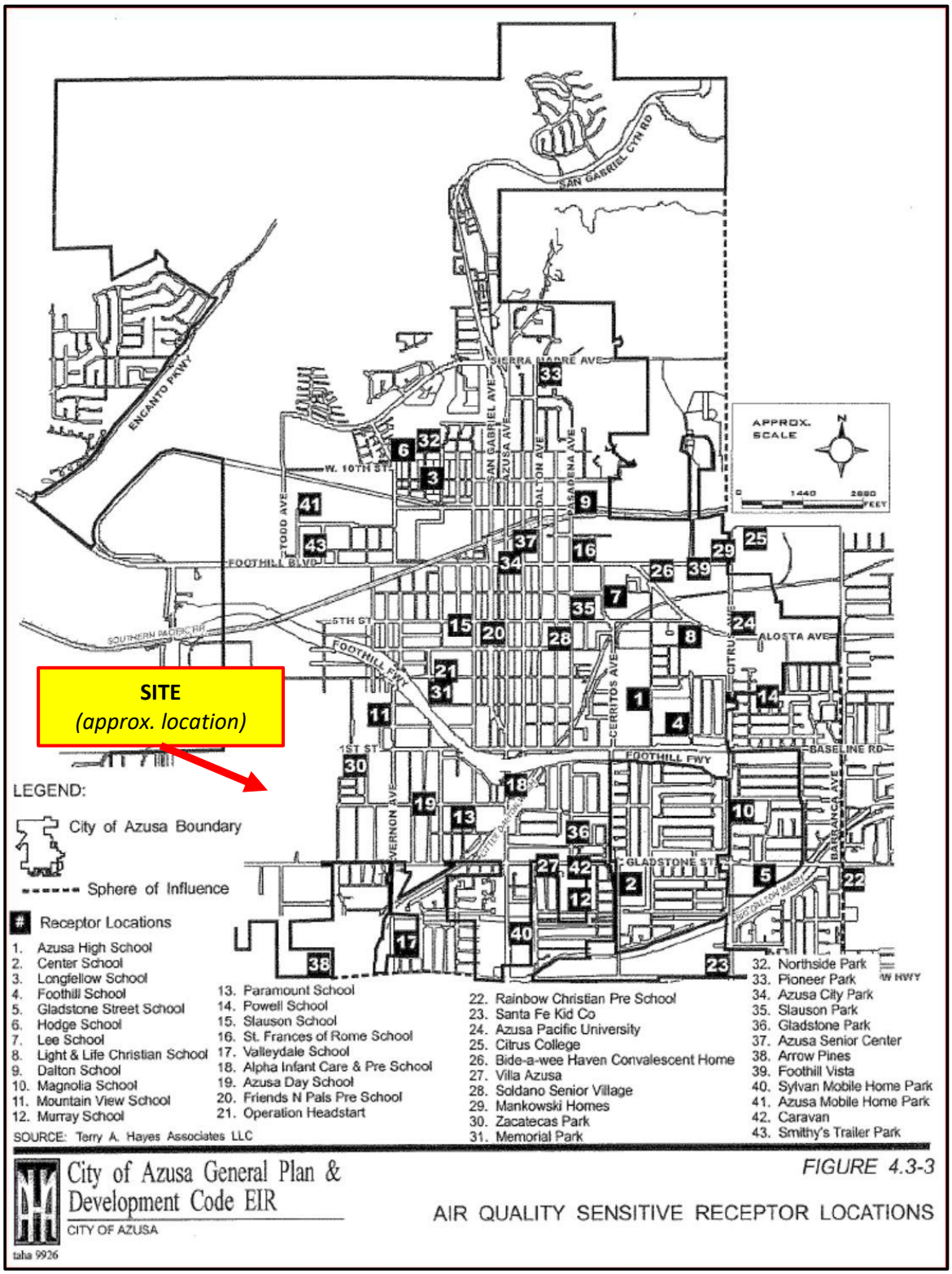
AQ-4 Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact With Mitigation Incorporated. Project construction, as mitigated, would not expose "sensitive receptors" to substantial pollutant concentrations, as explained below. Sensitive receptors are those individuals or land uses which are particularly sensitive to air pollution - the very young, the elderly and those suffering from certain illnesses or respiratory disabilities. Outdoor exercisers are also considered sensitive receptors due to their increased breathing rates. Land uses characterized as sensitive receptors include homes, medical facilities, rest homes, convalescent care facilities, schools, day care centers, parks, and recreational areas. Residents of homes and long-term care facilities may be subject to both long-term/chronic and acute exposures to poor air quality, whereas park users are primarily at risk from acute exposure to air quality.

There are no stationary sensitive receptors closer than approximately 2,900' to the project site. Figure 23 shows identified sensitive receptors within the City; the nearest, Zacatecas Park and Arrow Pines Mobile Estates, are respectively 4,500' northeast and 4,600' southeast of the project site. There are also residential neighborhoods south of Arrow Hwy, approximately 2,900' south of the project site. However, a recreational receptor (not mapped in the General Plan), the San Gabriel River Trail, runs in a north-south direction approximately 230' (70.1m) east of the project site (see Figure 24). Trail users would be considered sensitive receptors, although their level of exposure would vary depending on the users' speeds, breathing rates, etc. The site boundary adjacent to the trail measures approximately 200'; projected towards the trail, the site's dimensions from north to south measure approximately 430' (0.08 mile). Distance divided by velocity equals the time required to travel that distance (t = x/v). Traveling at a conservative 12 miles per hour, a cyclist would pass the site in 0.007 hr., less than one minute. Walking at two miles per hour, a pedestrian would pass the site in 0.4 hr., or 2.44 minutes. A runner moving at six miles per hour would pass the site in 0.01 hr., approximately one minute.

Because the project site is less than five acres in area, the Localized Significance Thresholds (LST) can be used to determine significance of the project's emissions to sensitive receptors. Project construction and operational emissions were evaluated against the LST emission concentration values for 25m (82'), 50m (164'), 100m (328'), 200m (656'), and 500m (1,640') from the project's western boundary to account for the trail's position 70m from the site. Table AQ-3 above shows that unmitigated project construction estimated emissions are below the 25m thresholds for NOx, and CO, but exceed the 25m and 50m thresholds for PM_{10} and $PM_{2.5}$, respectively. With mitigation as described in AQ-3 above, these emissions would be reduced to less than the 25m threshold. Remaining impacts to sensitive receptors from construction emissions would be less than significant.

Tables AQ-5 and AQ-6 shows that both unmitigated and mitigated operational emissions would not exceed the LST thresholds. Mitigation measure AQ-4 as described in part AQ-3 above would further reduce emissions from idling engines. Remaining impacts to sensitive receptors from operational emissions are anticipated to be less than significant.



Source: City of Azusa General Plan, Final EIR, Fig. 4.3-3

Figure 23 Sensitive Receptor Map

Source: Google Maps; Map Data 2021

Figure 24 Site Proximity to San Gabriel River Trail

AQ-5 Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant with Mitigation Incorporated. Project construction could expose workers and trail users to temporary odors from construction equipment engine exhaust and asphalt application. Odors associated with asphalt would be short-term and would not be present after asphalt cures. However, sensitive individuals, including construction workers, could consider such odors to be objectionable, even if short-term. Common asphalt additives can substantially reduce asphalt odors and reduce short-term impacts to less-than-significant levels (see, e.g., Ecosorb, *Asphalt Odor Control*, available at *https://ecosorbindustrial.com/industries/asphalt/* (accessed January 27, 2021) and Asphalt Solutions, Greatly Reduce Asphalt Odors Emitted During Asphalt Production or Lay Down, available at *http://www.asphaltsolutions.com/* (accessed January 27, 2021)). Mitigation Measure AQ-6 requires that an odor-reducing additive be used with all project asphalt application. With this mitigation, asphalt odors anticipated to be less than significant.

Long-term odors are not expected to be substantial, or to affect a substantial number of people, because the proposed warehouse would not have manufacturing or cooking operations that produce odors. Diesel-engine odors would be greatly reduced with application of Mitigation Measure AQ-4, which would prohibit on-site idling and reduce operational odors to less than significant levels.

5.2.5 Mitigation Measures

AQ-1 Project plans and bid documents shall specify that all construction equipment shall be equipped with EPA Tier-IV engines or better. "All construction equipment" includes, but is not limited to, air compressors, cement and mortar mixers, concrete industrial saws, cranes, excavators, forklifts, generator sets, graders, pavers, paving equipment, rollers, rubber-tired dozers, tractors, loaders, backhoes, and welders**.** Equipment shall be field-verified prior to beginning each construction phase by the City Building Official or designee.

AQ-2 Project plans shall specify "Low-VOC" architectural coatings for all interior and exterior applications, including structural coatings and parking lot striping, which have been formulated to exceed the regulatory VOC limits put forth by South Coast Air Quality Management District (SCAQMD) Rule 1113. Low VOC paints shall contain no more than 50 grams per liter of VOC.

AQ-3 Project plans shall specify SCAQMD compliance requirements for Rules 401, 402, 403, 404, 405, and 1110.2. Compliance shall be field-verified by the City Building Official at least twice weekly.

AQ-4 Prior to final occupancy, truck access gates and each loading dock shall be posted with signs containing these directives and information or equivalent, in English and Spanish/Español. Signs shall provide telephone numbers of the building facilities manager, City Code Enforcement, and the California Air Resources Board (CARB) to report violations. Dynamic QR codes may be added to facilitate information transmittal:

- **Prevent Air Pollution/Prevención de la contaminación atmosférica:**
    - Turn off truck engines when parked/
      Apaga los motores de los camiones cuando esté estacionado.

- Do not idle engines for more than 5 minutes/No se des ralentí durante más de 5 minutos.
- Call Building Facility Manager at _____ to report violations/
  Llama al gerente al _____ para informar de violaciones.
- Call City Code Enforcement at (626) 812-5265 if the manager is not available/
  Llama a la policía de código de la ciudad si el gerente no está disponible.
- Call the South Coast Air Quality Management District at 1-800-CUT-SMOG (288-7664) for assistance with violations/
  Llama a 1-800-2880-7664 por ayuda con infracciones.

AQ-5 If refrigerated storage is proposed for any portion of the warehouse, the project proponent shall request an amendment to the project's Conditional Use Permit and provide all information necessary for supplemental air quality impact review and appropriate mitigation.

AQ-6 Asphalt odor-suppression additives shall be required for all on-site hot-mix asphalt applications. Project engineering specifications shall incorporate additive specifications. This requirement shall be placed in all engineering notes sections on project plans.

5.2.6 Significance After Mitigation

Because the project contributes to the regional air pollutant load where the region is in federal and/or state non-attainment for ozone, PM_{10}, $PM_{2.5}$, and lead, even with mitigation, impacts are considered ***significant and unavoidable***.

5.2.7 Cumulative Impacts – Air Quality

The proposed project will be constructed in an area where there are several new warehouse developments proposed or already approved (see Table CP-1, Figure 20), and where surface mining is widespread. The project would contribute emissions proportionately to these existing or proposed sources, including the substances for which the area is in non-attainment. Cumulative impacts are therefore also ***significant and unavoidable.***

5.3 Greenhouse Gas Emissions

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5.3 Greenhouse Gas Emissions

5.3.1 Background and Regulatory Setting

Greenhouse gases (GHGs) emitted by human activity are generally understood to contribute cumulatively to global climate change, resulting in projected increases in ocean temperatures, melting of polar ice and associated sea level rise, changes to weather and precipitation patterns, and overall planetary warming. GHGs accumulate in the atmosphere allowing incoming short-wavelength visible sunlight to penetrate, while restricting outgoing terrestrial long-wavelength heat radiation from exiting the atmosphere. This phenomenon creates a greenhouse effect where Earth's heat is essentially trapped. The principal greenhouse gases (GHGs) include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Collectively, GHGs are measured as carbon dioxide equivalents (CO_2e) of metric tonnes (MT). 2

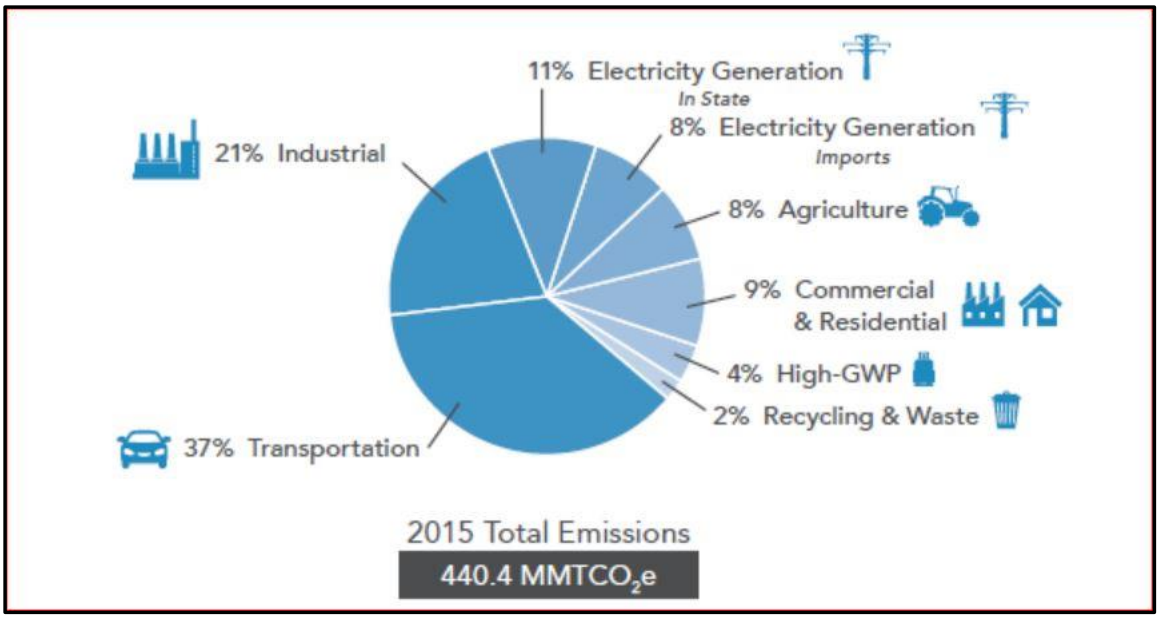
Fossil-fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of global GHG emissions, and approximately 37% of California's GHG emissions (California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, (CARB Scoping Plan) Figure 3, p. 11, available at *https://ww2.arb.ca.gov/sites/default/files/ classic/cc/scopingplan/scoping_plan_2017.pdf* (accessed February 1, 2021). Figure 25 below illustrates 2015 GHG emissions in California by sector.

Industrial and electricity-generating sources are the second-largest contributors of GHG emissions, constituting about one-third of total emissions.

The Global Warming Solutions Act of 2006 (Assembly Bill 32/AB 32), the principal legislation governing GHG emissions in California, mandated reducing California's GHG emissions to 1990 levels by 2020 and tasked the California Air Resources Board (CARB) with regulating GHG emissions as well as coordinating with other state agencies to implement AB 32's reduction goals. Subsequent legislation and executive orders target various GHG-emission sources and set forth strategies for local agencies, including Senate Bill (SB) 1368 (emissions performance standards for utilities), SB 375 (sustainable communities strategies), SB 535 (Greenhouse Gas Reduction Fund, identifying disadvantaged communities for investment), EO S-03-05 (GHG-reduction goal of 80% by 2050 from 1990 levels), EO S-20-06 (biofuels and biomass electricity generation targets), EO S-01-07 (low carbon fuel standard), EO S-13-08 (climate adaptation strategy/sea level rise), EO B-16-12 (zero-emission vehicle program), EO B-18-12 (state

[2] Climate change is predicted to adversely affect human health and infrastructure, wildlife habitats, biological resources agriculture capacity, and other resources. Considerable information regarding global climate change and California's role in counteracting human-caused warming may be found in the California Air Resources Board publication, *California's 2017 Climate Change Scoping Plan*, available at https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed February 1, 2021). The *Los Angeles Region Report for California's Fourth Climate Change Assessment* provides region-specific climate science information and projections, available at https://www.energy.ca.gov/sites/default/files/2019-11/Reg%20Report-%20SUM-CCCA4-2018-007%20LosAngeles_ADA.pdf (accessed February 1, 2021). *See also* numerous reports available at United Nations' Intergovernmental Panel on Climate Change website, https://www.ipcc.ch/ (accessed February 1, 2021).

agencies directed to purchase zero-emission vehicles), and EO B-30-15 (sets GHG emissions target for 2030 at 40% below 1990 levels).



Source: California Air Resources Board, California's 2017 Climate Change Scoping Plan, Figure 3, p. 1:

Figure 25 California Greenhouse Gas Emissions by Sector

SB 375 (Sustainable Communities and Climate Protection Act of 2008) was enacted to link land use and transportation in a manner that would reduce vehicle miles traveled (VMT), thereby reducing GHG emissions. Under SB 375, the California Air Resources Board (CARB) is responsible for establishing GHG emission-reduction targets, and regional Metropolitan Planning Organizations (MPOs) are responsible for preparing and adopting "Sustainable Communities Strategies" that achieve CARB's targets. In 2018, the CARB reported California was not "on track" to achieve the SB 375 GHG targets, and that more effort to reduce VMT throughout the state was required to correspondingly reduce GHGs from personal vehicles (CARB, *2018 Progress Report: California's Sustainable Communities and Climate Protection Act* (November 2018), pp. 21-28 available at *https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf* (accessed February 1, 2021).

EO-B-30-15 (codified in 2016 by SB 32) accelerated the GHG-emissions target for 2030 to 40 percent below 1990 levels. EO-B-30-15 also provided the CARB with additional direction for refining the Climate Change Scoping Plan, setting forth five "pillars" for accomplishing GHG reduction, including:

- Reducing today's petroleum use in cars and trucks by up to 50 percent;
- Increasing from one-third to 50 percent of electricity derived from renewable sources;
- Doubling the energy efficiency savings achieved at existing buildings and making heating fuels cleaner;
- Reducing the release of methane, black carbon, and other short-lived climate pollutants;
- Managing farm and rangelands, forests, and wetlands so they can store carbon; and

- Periodically updating the state's climate adaptation strategy, *Safeguarding California*.

The CARB's 2017 Climate Change Scoping Plan, cited above, in part implements EO B-30-15, and sets forth a "reference scenario" as a baseline for measuring how much GHG emissions can be reduced in several economic sectors. This scenario illustrates the level of GHG emissions generated statewide through 2030 with *existing* policies and programs, but without any further action to reduce GHGs. This level is estimated to be approximately 400 million metric tonnes (MMTs) of CO_2e from all sources in 2030. The CARB's statewide 2030 target level of emissions is approximately 260 MMTs (CARB Scoping Plan, Figure 6, *2017 Scoping Plan Scenario*, p. 24). The Scoping Plan estimates that the change from 1990 levels in the residential and commercial sectors must be from 44 $MMTCO_2e$ to 38-40 $MMTCO_2e$ by 2030, a four to eight percent reduction (id., Table 3, p. 31).

The Southern California Association of Governments (SCAG) is the local MPO that includes the City of Azusa and is developing a Regional Climate Adaptation Framework, which will assist local and regional jurisdictions in managing the negative impacts of climate change. The study will look at how the Southern California region can work together to plan and prepare for the impacts of sea level rise, extreme heat, increasingly frequent and damaging wildfires, and other climate-related issues (see *https://scag.ca.gov/climate-change-regional-adaptation-framework* , accessed February 1, 2021).

The SCAG also develops and implements the Regional Transportation Program/Sustainable Communities Strategy discussed in Section , Air Quality, above. Strategies in the RTP, such as promoting park-and-ride facilities, contribute to reducing the region's GHG emissions by reducing vehicle miles traveled.

5.3.2 Significance Thresholds

It is possible to determine the significance of a project's CO_2e emissions by assessing a project's consistency with an SCS or with the CARB Scoping Plan. If the project is consistent with a plan's goals, policies, or is specifically identified within a Plan, a finding of "less than significant" or "less than significant with mitigation incorporated" may be appropriate. Compliance with GHG-reduction strategies may not itself demonstrate that an individual project's impacts are less than significant; however, unless an emissions target or threshold, based on substantial evidence has been adopted by a local agency, consistency with such strategies may be the only measure of a project's impacts. To date, SCAG, Los Angeles County, and the City of Azusa have not set quantified CO_2e emissions targets or numeric thresholds, and the SCAQMD has set a CO_2e threshold only for stationary industrial sources that require SCAQMD permits (10,000 metric tonnes per year).

In this EIR, the proposed project's estimated emissions will be compared to the CARB 2017 Scoping Plan emissions-reduction goals.

5.3.3 CEQA Significance Criteria

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the CEQA Guidelines, as amended, and used by the City in its environmental review process. The Initial Study Checklist includes questions relating to greenhouse gas emissions. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Based on these significance thresholds and criteria, the Project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less-than-significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

5.3.4 Impact Analysis

GHG-1 Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact with Mitigation Incorporated. The proposed project would generate greenhouse gas emissions during construction and operation. Table GHG-1 below shows the approximate "business-as-usual" scenario for construction and operation, and a mitigation scenario that incorporates compliance with the CalGreen Building Code (Title 24) and additional mitigation measures, such as installing LED-equipped indoor and outdoor lighting, planting a minimum number of trees, and using an array of water-conserving strategies.

The CalEEMod Emissions estimating software, described previously in Section 5.3, Air Quality, was used to estimate the project's GHG emissions.

Table GHG-1 below shows estimated CO_2e mass emissions for project construction and operation. Unmitigated construction emissions are estimated to be 448.73 metric tonnes of CO_2e in 2021, and 59.66 MT in 2022. Unmitigated operational emissions are estimated at 623.7 MT CO_2e per year. Mitigated operational emissions are estimated to be 566.87 MT CO_2e/year (mitigated construction CO_2e emissions are identical to the unmitigated emissions because the CO_2e-reduction measures in the CalEEMod software are generally limited to operational measures).

As discussed above, GHG emissions are cumulative in nature, and in the absence of a numeric emissions threshold, it is reasonable to assume that the project's unmitigated CO_2e emissions result in a significant impact requiring mitigation. Table GHG-1 illustrates the effect of mitigation measures on the project's estimated CO_2e. emissions: operational emissions would be reduced to 566.7 MT CO2e/year, nine percent less than unmitigated emissions. This percent reduction exceeds the CARB Scoping Plan's recommended percent emission reductions of four to eight percent (assuming that unmitigated, business-as-usual emissions would be similar to 1990 levels). Based on the achievable GHG emission reductions by applying Mitigation Measures GHG-1 through GHG-4, remaining impacts associated with direct CO_2e emissions are anticipated to be less than significant.

Table GHG-1 Annual GHG Emissions Summary (CO_2e)

Phase	Metric Tons (MT) CO_2e/YR
	Without Mitigation[a]
Construction 2021	448.73
Construction 2022	59.66
Total Construction	**508.39**
Operation	**623.70**
	With Mitigation
Construction 2020	448.73
Construction 2021	59.66
Total Construction	**508.39**
Operation	**566.87 (~ 9.11% reduction)**

"Without Mitigation" for CalEEMod purposes means that estimated future project building construction and operational data were entered without adjusting for equipment engine emissions or operational features required in the California Building Code (Title 24). This is essentially the "business as usual" scenario.

"Mitigation" for CalEEMod purposes can mean inherent design features of a project, such as increasing a project's "walkability," thus reducing vehicle trips. Features of future construction that are required by the California Building code are also included in emissions estimates, such as water-conserving plumbing and irrigation systems, and adherence to green building standards. Mitigation measures applied include requiring interior and exterior LED lighting throughout.

GHG-2 Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Significant and Unavoidable. The proposed project would conflict with regional GHG-reduction plans and regulations, because as discussed in Section 5.6, Transportation and Circulation, the project's estimated VMT/person exceed the City of Azusa's VMT/person threshold, and cannot be mitigated to less than the threshold. Moreover, decreasing VMT overall, particularly for new land development projects, is a principal goal of AB 32, SB 375 and the CARB 2017 Scoping Plan, and the CARB 2018 Progress Report described above, because vehicle emissions constitute a substantial component of overall GHG emissions (see Fig. 25 above, for a snapshot view of GHG emissions by sector). Because there is no feasible means of reducing the project's VMT/person or overall VMT, thereby eliminating conflicts with City thresholds and regional and statewide goals, impacts would be significant and unavoidable.

5.3.5 Mitigation Measures

GHG-1 Final landscape plans shall incorporate at least 51 trees, conforming to project conceptual plans. Tree count shall be verified prior to occupancy.

GHG-2 Project plans shall specify how the Project's energy efficiencies will meet applicable current California Title 24 (Green Building Code) Energy Efficiency Standards.

GHG-3 Project plans shall specify high-efficiency LED lighting for interior and exterior lighting applications.

GHG-4 To reduce water consumption and associated energy-use, the Project shall be designed to comply with the mandatory reductions in indoor water usage contained in the current California Green Building Code and any mandated reduction in outdoor water usage contained in the City of Azusa's water efficient landscape requirements. Additionally, the Project shall implement the following:

- All plant materials shown in the project's landscape plans shall be drought-adapted plant material suitable for Sunset Western Garden Book[3] Zone 21; plants native to and/or compatible with the San Gabriel Valley/foothills shall be emphasized;
- Landscape irrigation shall use water-efficient irrigation technology, including rain-sensing shutoff features;
- Project plans shall specify light colored "cool" roofing material, and Energy Star-rated heating, cooling, and lighting devices;
- Project plans shall specify EPA Certified WaterSense-labeled or equivalent faucets, high-efficiency dual-flush toilets, and water-conserving shower heads (as applicable – if showers are not provided on-site, water-conserving shower heads shall not be required).

5.3.6 Significance After Mitigation

The project's GHG impacts are ***significant and unavoidable,*** as explained above, because the project's VMT cannot be mitigated by feasible means.

5.3.7 Cumulative Impacts

The proposed project will be constructed in an area where there are several new warehouse developments proposed or already approved (Table CP-1, Figure 20), with corresponding commute and client (freight trucks) vehicle trips that cannot reasonably be taken by transit or alternative means. The project's VMT would contribute greenhouse-gas emissions associated with truck and passenger vehicle

[3] Time Home Entertainment Inc., *The New Sunset Western Garden Book* (2012).

exhaust. Zero-emission freight transport is foreseeable within the next 20 years[4] but requiring a private facility to limit its customers to such vehicles is not under the City's control (see discussion in part 5.5, Transportation and Circulation, below). Cumulative impacts are therefore ***significant and unavoidable.***

[4] The California Air Resources Board has set 2035 as a target date for requiring that at least 40% of all tractor-trailer trucks sold in California be zero-emission. See, e.g., SAE International (formerly Society of Automobile Engineers), *Zeroing In On Zero Emissions* (July 29, 2020), available at https://www.sae.org/news/2020/07/zero-emission-commercial-vehicles (accessed March 26, 2021).

5.4 Hazards and Hazardous Materials

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5.4 Hazards and Hazardous Materials

This section describes the potential for the Project to expose the public to hazards, hazardous materials, or risk of upset that may be related to existing conditions or new hazards created as a result of the Project. Where significant impacts are identified that cannot be addressed by existing regulations, mitigation measures are provided to reduce these impacts. Applicable regulations and compliance processes are summarized. Analysis in this section incorporates and relies on the *Phase I Environmental Site Assessment: Proposed Industrial Building, 411-415 South Motor Avenue, Azusa, California* (Salem 2020) (August 3, 2020), prepared by Salem Engineering (included as Appendix C). The assessment included a site reconnaissance conducted on June 25, 2020.

"Hazardous material" refers to both hazardous *substances* and hazardous *waste*. A material is defined as "hazardous" if it appears on a list of hazardous materials prepared by a Federal, Tribal, State, or local regulatory agency, or if it possesses characteristics defined as "hazardous" by such an agency (United States Environmental Protection Agency (U.S. EPA), *Hazardous Waste: Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes*, available at *https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes* (accessed February 11, 2021). A "hazardous waste," as characterized by the federal Resource Conservation and Recovery Act (RCRA) § 6921(a), is a solid waste that exhibits toxic or hazardous characteristics, i.e., "toxicity, persistence and degradability in nature, potential for accumulation in tissue, and other related factors such as flammability, corrosiveness, and other hazardous characteristics." Examples include trichloroethylene (TCE), tetrachloroethylene (PCE), xylene, and lead compounds.

Hazards evaluated in this section also include project-generated risk associated with proximity to airports, wildland fire, and project-generated interference with emergency response or evacuation plans.

5.4.1 Environmental Setting

The 4.2-acre site is developed with six vacant industrial buildings of various ages, shapes, and sizes, described below. All buildings are in disrepair and appear to have exceeded their useful life. There is almost no landscaping, with the exception of a non-native Eucalyptus tree and ornamental shrubs on the site's Motor Avenue frontage. The remainder of the site is paved with deteriorating asphalt. The previous tenant of the property was the Rain Bird Corporation, which used the facility for warehousing landscape irrigation parts manufactured off-site. The facility had been used for manufacturing irrigation products from the mid-1950s through 2017. See Salem 2020 Photos 1-32 and Salem 2020 Appendix C for site photographs and historical map imagery.

According to a 2017 soils report prepared for the site, the subject property is underlain by unconsolidated alluvial sands, silts and clays, cobbles and boulders that have accumulated over time by erosion from the San Gabriel River canyon to the north. The proportion of gravel-and-boulder-size to sand-size particles varies, contributing to high soil porosity. Gravels and cobbles consist primarily of quartz-rich granitic rock, characteristic of the San Gabriel Mountains.

Depth to groundwater at the project site is unknown (boring conducted in 2017 did not reveal groundwater or saturated soils as deep as 150' below the ground surface (bgs) (Salem 2020, pp. 5-6,

citing Lindmark Engineering, *Soils Sampling and Underground Storage Tank Closure Report, 435 South Motor Avenue, Azusa, California* (December 28, 2017)). According to RWQCB records for the Cemex leaking underground storage tank (LUST) site at 1201 Gladstone Street in Azusa, California, located approximately 350 feet northeast of the subject property, depth to groundwater in the surrounding area was expected to be more than 200 feet bgs. Additionally, the LADPW Water Resource Division website (*https://dpw.lacounty.gov/general/wells/#* (accessed February 12, 2021)) provides information on active and inactive wells in the area surrounding the subject property, as well as well locations and water surface elevation data. According to the website, approximately 20 inactive wells are present within a one-mile radius of the subject property. Four active wells are present within a one-mile radius of the subject property with depths to groundwater ranging from 270 to 302 feet bgs. Local groundwater level and flow direction may vary due to seasonal fluctuations in precipitation, usage demands, geology, and/or surface topography (Salem 2020, p. 6).

The subject property is located within a region of known groundwater contamination designated by the U.S. EPA as a National Priority List (NPL), a.k.a. "Superfund" site. The NPL is the list of sites of national priority among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the EPA in determining which sites warrant further investigation. There are currently 1327 sites on the NPL (U.S. EPA, Superfund: National Priorities List (NPL), available at *https://www.epa.gov/superfund/superfund-national-priorities-list-npl* (accessed February 13, 2021).

The San Gabriel Valley Area 2 Superfund Site (a.k.a. Baldwin Park Operable Unit) encompasses the project site (U.S. EPA, Superfund Site: San Gabriel Valley (Area 2), Baldwin Park, CA (available at *https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0902092* (accessed February 13, 2021). The greater San Gabriel Valley NPL area includes multiple locations of contaminated groundwater within the 170-square-mile San Gabriel Valley. It has been estimated that over 30 square miles of groundwater under the San Gabriel Valley are contaminated, predominantly by the volatile organic compounds (VOCs) trichloroethylene (TCE) and tetrachloroethylene (PCE). From approximately the 1940s through the 1980s, carbon tetrachloride, TCE and PCE, as well as other chlorinated solvents were used by hundreds of businesses in region for degreasing, as raw materials for automotive products, by solvent recyclers, for chemical extractions, and other purposes. VOC-contaminated groundwater was first discovered in the project vicinity in 1979, when Aerojet Electrosystems in Azusa sampled nearby wells within the Valley County Water District (Salem 2020, pp. 1-2).

In 1985, the EPA began enforcement efforts, investigating historical Federal, State, and local records regarding chemical usage, handling, and disposal (Salem 2020, p. 2). Cleanup efforts have since treated at least 165 billion gallons of contaminated groundwater, and have removed more than 94,000 lbs. of waste; currently-operating extraction and treatment systems process at least 18 million gallons per day (U.S. EPA, San Gabriel Valley (Area 2), Baldwin Park, CA, Announcements and Key Topics (available at *https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Stayup&id=0902092#Stayup*) (accessed February 13, 2021)).

Also in 1985, the California Regional Water Quality Control Board (RWQCB) began a Well Investigation Program (WIP) to identify the sources of groundwater contamination detected in water supply wells. The RWQCB evaluated historical usage of VOCs at the subject property in the 1990s as part of the WIP, and determined that the subject property was not a potential responsible party (PRP) for the

contamination (i.e., the subject property was not a *source* of groundwater contamination). No further investigation was recommended with respect to the known groundwater contamination in the area (Salem 2020, p. 2).

Site History. From the mid-1950s to approximately 2017, the subject property was used for manufacturing irrigation products, including metal parts, and operating two concrete clarifiers (settling tanks with mechanical rakes that separate solids from a liquid). As detailed below, a Controlled Recognized Environmental Condition (CREC) was identified at the project site in 2016, involving metal-contaminated soils and soil-borne VOCs. Additionally, two "Historical Recognized Environmental Conditions" (HRECs) were identified involving underground storage tanks and concrete clarifiers (id., pp. 2-3).

> ***CREC: Metal-Contaminated Soils and Soil-borne VOCs.*** A 1990 subsurface investigation identified metal-contaminated soils, and indicated that approximately 3,720 tons of metal-contaminated soil were hauled off-site for disposal (id., p. 3).
>
> In 2016, two small sub-slab plumes of VOCs and additional metal-contaminated soils were identified at the subject property. In 2018, under the oversight of the Los Angeles County Fire Department (LACFD), additional metal contaminated soils (approximately 33.6 tons) were hauled off-site for disposal and a SVE system removed some of the sources of the sub-slab VOC plumes (approximately 7 pounds of solvents) (id., p. 3).
>
> Remaining soils at the subject property contained low concentrations of metals (primarily lead) and petroleum hydrocarbons. Additionally, soil vapor contained low concentrations of VOCs, including PCE and TCE. The LACFD determined that concentrations of petroleum hydrocarbons in soil near Building 4 and subsurface vapor concentrations of VOCs in sub-slab soils were protective of groundwater and suitable for commercial use (using regulatory guidance in place in early 2019). However, in the portion of the subject property containing Buildings 1 through 4, concentrations of PCE and TCE exceeded residential screening levels. Therefore, the LACFD determined that "no further action" was necessary at the subject property but imposed a deed restriction that prohibits residential, hospital, school, or day care center uses on this portion of the subject property (id.)
>
> Subsequent to the case closure and deed restriction, the California Department of Toxic Substances Control (DTSC) modified its regulatory guidelines. The concentrations of PCE and TCE identified in soil vapor at the subject property, now exceed the DTSC's new regulatory guidelines for commercial use. The Salem 2020 report opines that due to the identified contamination remaining on the subject property, a potential vapor intrusion condition "cannot be ruled out" at the subject property (id.).
>
> ***Underground Storage Tanks.*** According to the Los Angeles County Department of Public Works (LACDPW) records, two 3,000-gallon diesel underground storage tanks (USTs) were removed from the subject property on December 6, 2017. Four soil samples were collected below the former USTs and one sample was collected below the dispenser. Diesel odor and photo-ionization detector (PID) readings of 9.89 parts per million (ppm) were recorded in shallow soil during removal of the concrete dispenser box. The impacted soil was removed to approximately 4 feet below ground surface (bgs) until no further odor or PID readings were recorded.

Laboratory analytical results of the soil samples collected beneath the former USTs and dispenser indicated non-detectable concentrations of total petroleum hydrocarbons as gasoline (TPH-g) and diesel (TPH-d); benzene, toluene, ethylbenzene, and xylenes (BTEX); methyl tert-butyl ether (MTBE); or fuel oxygenates. No total recoverable petroleum hydrocarbons (TRPH) were detected in any of the soil samples, except in one sample collected at 13 feet bgs (10.8 milligrams per kilogram [mg/kg]) (id., p. 2).

Groundwater was not encountered during the UST removal and soil sample collection. On January 10, 2018, the LACDPW referred the case to the RWQCB citing that the RWQCB is the primary agency responsible for overseeing corrective action activities. After review of the closure documents, the RWQCB determined that residual concentrations of fuel constituents posed a low threat to human health and to soil and groundwater quality beneath the site and issued a "no further action" letter on March 15, 2018 (id.).

Concrete clarifiers. According to the LACDPW records, on August 15, 1990, Rain Bird Corporation notified the LACDPW that they would permanently abandon by removal two 1,000-gallon concrete clarifiers at 413 South Motor Avenue (an incorrect address in the records). According to an October 23, 1990, Report of Subsurface Investigation, prepared by Targhee, Inc. (Targhee), one 3-stage clarifier, historically located immediately west of Building 4 (419 South Motor Avenue), was removed. No discolored or stained soil was observed. Fill (foundry sand) from the inside of the clarifier was removed and stockpiled on-site for later disposal (id., pp. 2-3).

Soil samples were collected from approximately one foot and four feet beneath each end of the clarifier. The samples were analyzed for halogenated and aromatic hydrocarbons, TPH, and CAM metals. No halogenated or aromatic hydrocarbons were detected; TPH was detected in low concentrations (≤32 mg/kg); and metals detected were consistent with background concentrations. On April 22, 1991, the LADPW issued a "no further action" letter regarding this clarifier (closure permit 7322B) (id.).

On April 10, 1991, Rain Bird Corporation applied for a second clarifier removal at Building 3 (415 South Motor Avenue), indicating the vessel was removed under closure permit 7322B, and that this was the clarifier that had been filled with concrete in about 1987. Although no sampling records were located at the LADPW for the second clarifier, on April 10, 1991, the LADPW issued a "no further action" letter for the second clarifier.

According to a November 15, 2016, Phase II Environmental Site Assessment, prepared by Advanced Geo Environmental, Inc. (AGE), soil vapor sampling performed near the clarifier that had been located immediately west of Building 3 (former paint shop) reported PCE at a concentration of 0.1 micrograms per liter (µg/L), but did not detect other volatile organic compounds (VOCs).

Soil vapor sampling performed near the clarifier that had been located immediately west of Building 4 (former die casting shop) reported PCE at 0.1 µg/L , but no other VOCs were detected. Based on the low concentrations of VOCs in soil vapor prior to the installation and operation of the soil vapor extraction (SVE) system on-site (January 2018 to December 2018) and the

regulatory status of the clarifiers, the Salem 2020 report concluded that no further investigation of these former clarifiers is warranted. (id., pp. 2-3).

Existing Buildings and Structures (to be demolished as part of site development). There are six buildings and several other structures on the subject property. All buildings are currently vacant. They include:

- Building 1 (411 South Motor Avenue), constructed about 1956, is an approximately 20,300 square-foot, two-story steel-frame warehouse structure on a concrete slab-on-grade foundation, with corrugated metal exterior walls and a pitched corrugated metal roof that is covered with built-up roofing. The interior is an open warehouse area. There is an electrical panel/transformer on the south wall of the building. In the northwest corner of the building is a utility room that includes a fenced-in electric panel. Immediately east of the fenced area is a vacant room that contains an electrical distribution panel with a transformer (id., p. 7).
- Building 2 (413 South Motor Avenue), constructed in about 1956, is an approximately 17,200 square-foot, single-story steel-frame warehouse structure on a concrete slab-on-grade foundation, with concrete tilt-up exterior walls and a flat roof covered with built-up roofing. The interior is primarily a warehouse area, with a break room, restrooms and several offices located along the north wall of the building. There are electrical panels on the west wall and on the east wall of the building (id.).
- Building 3 (415 South Motor Avenue), constructed in about 1957, is an approximately 10,700 square-foot, single-story steel-frame office/warehouse structure on a concrete slab-on-grade foundation, with concrete block and wood-paneled exterior walls and a flat roof covered with built-up roofing. The interior comprises a warehouse area connected to a 3,790 square-foot office space. The warehouse area includes a small former paint shop in the northwest corner, a small maintenance area on the south wall, and restrooms and offices on the east side of the building (id.).
- Building 4 (419 South Motor Avenue), constructed in about 1960, is an approximately 9,850 square-foot, two-story steel-frame warehouse structure on a concrete slab-on-grade foundation, with corrugated metal exterior walls and a pitched corrugated metal roof covered with built-up roofing. The interior comprises a warehouse area and a two-story office space with restrooms in the southeast corner of the building. Near the west wall is a 15’ x 1’ x 18” deep trench drain that is covered by metal grating (id.).
- Building 5 (415A South Motor Avenue), constructed in about 1958, is an approximately 2,400 square-foot, single-story steel-frame warehouse structure on a concrete slab-on-grade foundation with corrugated metal exterior walls and a pitched corrugated metal roof. The building was most recently used for documents storage. There is a restroom in the southeast corner of the building (id., pp. 7-8).
- Building 6 (415B South Motor Avenue), constructed in about 1958, encompasses an approximately 4,800 square-foot, single-story steel-frame warehouse structure on a concrete slab-on-grade foundation, with corrugated metal exterior walls and a pitched corrugated metal roof. The interior was used for storage. The northern portion of the building includes a block-walled break area. There is an addition in the west portion of the building (id. p. 8).
- Two empty ASTs (silos) are located near the northwest corner of the subject property, immediately west of Building 2. According to reports from the Rain Bird Corporation, these silos are empty and were previously used to store raw materials (plastics) for the manufacture of polyethylene drip lines

and tubing. No evidence of staining or spillage was observed in the vicinity of the ASTs at the time of the site reconnaissance (id).

- An approximately 4' x 4' x 8'-deep concrete pit, covered by a metal grate, and with ladder rungs on the pit wall, is located in the north-central area of Building 1. According to information provided by the Rain Bird Corporation, the pit was not a sump that collected liquids, but was an emergency exit from a furnace pit – a three-foot-diameter concrete access pipe ran approximately 20 feet from the pit to the ladder hole access, and was entirely within the foundry building and the adjacent electric switchgear room to the immediate north, where the ladder exit was located. No evidence of stains or spills were observed in or around the pit during Salem's site reconnaissance (id.).
- There are one pad-mounted and six pole-mounted electrical transformers on the subject property. Salem personnel observed that the transformer casings displayed no visual evidence of leakage, and the ground surface below the transformers displayed no evidence of discoloration. Based on the absence of staining or fluids adjacent to the on-site transformers at the time of Salem's site reconnaissance, the on-site transformers are not currently anticipated to pose an adverse impact to the subject property (id.).

The 2020 Salem site reconnaissance revealed no hazardous substances and/or petroleum products stored or handled on the subject property at the time of investigation. Exposed surface soils did not exhibit obvious signs of discoloration. No other obvious evidence (vent pipes, fill pipes, dispensers, etc.) of USTs was noted within the area observed. No standing water or major depressions were observed on the subject property. No indications of former structures, such as foundations, were observed on the subject property (id.).

Adjacent properties. The properties north and south of the project site, Norac Company and R.E. Atckinson Company Inc. respectively, have been investigated by the DTSC and the LACFD for soil vapor contamination. The Norac Company entered into a Corrective Action Consent Agreement with the DTSC in 2004, and that agreement has since been satisfied and the case closed. The R.E. Atckinson property is now overseen by the LACFD. The Salem report indicates that this case is still open; however, the property is down-gradient from the subject property. Contamination underlying the R.E. Atckinson property is thus not anticipated to affect the project site. No records were found for the properties to the east and west, and Salem's site reconnaissance did not reveal land uses that were likely to handle or store significant quantities of hazardous materials, although several properties have either been investigated or are registered with the EPA (id, pp. 8-9, Table II; extended discussion at pp. 17-21).

5.4.2 Regulatory Setting

Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the 1986 Superfund Amendments and Reauthorization Act (SARA) (42 U.S.C.A. §§ 9601-9675). CERCLA, also known as the Superfund Act, was enacted by Congress in 1980 after the Love Canal incident, where a chemical-waste-filled canal in Niagara Falls, New York, had been covered and the surrounding area developed with residences and a school in the 1950s. Through the 1960s and 1970s, chemical leachate spread through groundwater and soils, affecting residents, and contributing to birth defects and cancers. Ultimately, public outcry led to investigations, federal response, and CERCLA (See

U.S. EPA., Superfund Site: Love Canal, Niagara Falls, New York, available at *https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0201290#bkground* (accessed February 13, 2021)).

CERCLA established a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to chemical spills – "releases" - or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA also established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. Significantly, CERCLA authorizes abatement actions - short-term and long-term removal of hazardous substances. Short-term removal includes actions that may be taken to address releases or threatened releases requiring prompt response. Long-term remedial response actions permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening.

The Superfund program maintains the National Priorities List (NPL) (described in Environmental Setting above) of sites where there are known releases of hazardous substances, pollutants, or contaminants, and which warrant further EPA investigation.

Solid Waste Disposal Act (42 U. S. C. A. §§ 6901-6992k) established federal authority over solid waste, particularly hazardous waste. Subchapter III, the **Resource Conservation and Recovery Act (RCRA)** enacted in gives the U.S. EPA the authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. Subchapter IX, enacted in 1984, enables the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. Subchapter VII, particularly § 6972, contains important provisions regarding the public's ability to bring citizen lawsuits against the EPA for failure to perform non-discretionary enforcement actions.

Toxic Substances Control Act (TSCA) (15 U. S. C. A. §§ 2601-2697). The TSCA initiated an EPA-led program to develop data about and to regulate use of toxic chemicals that pose risks to human health and the environment. Among the chemicals regulated under TSCA are asbestos (particularly in schools and public and commercial buildings), lead-based paint, radon, formaldehyde, mercury, and composite wood materials. Violators are subject to civil and criminal penalties, and citizen suits are permitted.

Hazardous Materials Transportation Authorization Act of 1994 (HTMAA) (49 U. S. C. A. §§ 5101-5128)**.** The HMTA sets the basic statutory requirements for hazardous materials transportation in "commerce," whether interstate or intrastate (49 U. S. C. A. § 5103(b)). This law authorizes the federal government to designate certain materials as "hazardous" when determined that their transportation in particular forms or quantities would cause "an unreasonable risk to health and safety or property" (49 U. S. C. A. § 5103(a)). Materials that are explosive, radioactive, infectious, flammable, combustible, toxic, oxidizing, and corrosive materials as well as compressed gases are generally considered hazardous under the HTMAA. The law and corresponding federal regulations cover various aspects of hazardous materials transportation, including hazardous materials classification, hazard communication, packaging requirements, operational rules, training and security, and registration. Transporters are required to

register and pay annual fees to the Department of Transportation, which has enforcement authority over violations. Violations are subject to criminal and civil penalties.

National Incident Management System (NIMS). As required by Presidential Directive-5 in 2003, the Department of Homeland Security (DHS) instituted National Incident Management System (NIMS) in 2004 (updated in 2008 and 2017) (see Federal Emergency Management Agency (FEMA), National Incident Management System, available at *https://www.fema.gov/ emergency-managers/nims* (accessed February 13, 2021). The NIMS provides a consistent nationwide template to establish federal, state, tribal and local governments, private sector, and nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from major domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism. NIMS benefits include a unified approach to incident management, standard command and management structures, and emphasize preparedness, mutual aid, and resource management.

Standards for Environmental Site Assessments (ESA). A Phase I ESA is the initial investigation phase of a process established by the American Society for Testing and Materials Standards (ASTM), cited by the Superfund Clean-Up Act of 1998 as adequate due diligence by new purchasers of properties or their lenders prior to site development. Phase I ESAs must be completed prior to property development by private parties to establish that the buyer has exercised due diligence in purchasing the site.

The U.S. Environmental Protection Agency (EPA) sets forth requirements for preparers of Phase I and Phase II ESAs. EPA has also established substantive standards for the information to be included in Phase I ESAs. Under this environmental assessment process, a Phase I ESA report prepared for a real estate holding would identify existing or potential environmental contamination liabilities. The Phase I ESA typically addresses both the underlying land as well as physical improvements to the property. The Phase I ESA site examination typically includes a jurisdictional agency file search for any reported issues, and may also include definition of any evident signs of possible asbestos- or lead-containing building materials or chemical residues in existing structures; identification of possible hazardous substances stored or used onsite; assessment of possible mold and mildew; and discussion of other relevant hazardous materials issues. Actual sampling of soil, air, groundwater, or building materials typically is not conducted during a Phase I ESA. The Phase I ESA generally is considered the first step in the environmental due diligence process.

If a Phase I ESA indicates evidence of site contamination, a Phase II ESA would be required prior to site development. The Phase II ESA includes collection of original samples of soil, groundwater, or building materials to measure and analyze quantities of various contaminants. The most frequent substances tested for are petroleum hydrocarbons, heavy metals, pesticides, solvents, asbestos, and mold. Appropriate cleanup levels for each contaminant, based on current and planned land use, would be determined in accordance with professional procedures adopted by the lead jurisdictional agency (e.g., DTSC, SWRCB, SCAQMD, CUPA). At sites near ecological receptors, such as sensitive plant or animal species that could be exposed to hazardous materials, cleanup levels would be determined according to the jurisdictional agency's adopted standards.

State Regulations

Hazardous Waste Control (CA Health and Safety Code §§ 25100-25259). Chapter 6.5 of the Health and Safety Code, administered by the Cal-EPA Department of Toxic Substance Control, is the primary state law regulating hazardous waste. It sets forth standards for hazardous waste facilities, transport, disposal, as well as procedures for administrative, civil, and criminal enforcement. It establishes programs for source-reduction and recycling of hazardous wastes, household, and small-quantity generator hazardous wastes, and used oil. Section 25167.3 pre-empts local governments from regulating hazardous waste *transportation*, but the law does not generally restrain local governments from otherwise regulating hazardous waste within their jurisdictions.

California Environmental Health Standards for the Management of Hazardous Materials (22 CCR Title 22, §§ 66250 – 69600.7)). Administered by the Cal-EPA Department of Toxic Substances Control (DTSC), Division 4.4 of Title 22 implements applicable state and federal laws governing hazardous wastes in the State. In addition to identifying and listing hazardous wastes, this Division sets forth numerous regulations concerning standards and practices for hazardous waste generators and distributors, facilities, particularly with respect to recyclable hazardous wastes, military munitions, land disposal, mercury-containing equipment, used oil, perchlorate materials, treated wood waste, fluorescent light ballasts, and extremely hazardous wastes. Section 67391.1(a) requires that restrictive land use covenants shall be executed and recorded when (1) facility closure, corrective action, remedial or removal action, or other response actions are undertaken pursuant to division 20 of the Health and Safety Code; and (2) hazardous materials, hazardous wastes or constituents, or hazardous substances will remain at the property at levels which are not suitable for unrestricted use of the land. 22 CCR Title 22, § 66261.24 sets toxicity thresholds for numerous chemicals, both synthetic and naturally-occurring (*see* Thomas Reuters Westlaw, California Code of Regulations, § 66261.24, *Characteristics of Toxicity*, available at *https://govt.westlaw.com/calregs/Document/I07DBE58C0F8C446C9715168D2C88CC9E?transitionType=Default&contextData=%28sc.Default%29* (accessed February 17, 2021)).

Hazardous Materials Disclosure Program (Unified Program). Administered by Cal-EPA, the Unified Program ensures that local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Unified Program consolidates multiple environmental and emergency management programs, including the Aboveground Petroleum Storage Act (APSA) Program, Area Plans for Hazardous Materials Emergencies, California Accidental Release Prevention (CalARP) Program, Hazardous Materials Release Response Plans and Inventories (Business Plans), Hazardous Material Management Plan (HMMP), Hazardous Material Inventory Statements (HMIS) (California Fire Code), Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs, and the Underground Storage Tank Program (see CalEPA, *More About the Unified Program*, available at *https://calepa.ca.gov/cupa/about/* (accessed February 13, 2021). Under this program, all businesses handling more than a specified amount of hazardous or extremely hazardous materials must submit a Hazardous Materials Business Plan to the local Certified Unified Program Agency (CUPA). The CUPA for the City of Azusa is the Los Angeles County Fire Department, Health Hazardous Materials Division (HHMD) (see County of Los Angeles Fire Department, Hazardous Materials Program, available at *https://fire.lacounty.gov/hazardous-materials-program/* (accessed February 13, 2021). The HHMD requires a business plan to be prepared, submitted, and

implemented by any business handling hazardous materials or a mixture containing a hazardous material. These businesses include, but are not limited to:

All hazardous waste generators, regardless of quantity generated;
Any business that uses, generates, processes, produces, treats, stores, emits, or discharges a hazardous material in quantities at or exceeding:

- 55 gallons or more of a liquid;
- 500 pounds or more of a solid; or
- 200 cubic feet (compressed) of gas at any one time in the course of a year;

Any business that handles, stores, or uses Category (I) or (II) pesticides, as defined by the Federal Insecticide, Fungicide and Rodenticide Act, regardless of amount; and/or
Any business that handles Department of Transportation Hazard Class 1 explosives.
In addition, businesses are required to submit an amendment to their business plan within 30 days of any of the following events:

- A 100 percent or more increase in the quantity of a previously disclosed hazardous material
- Any handling of a previously undisclosed hazardous material subject to inventory requirements:
- Change of business address;
- Change of ownership; or
- Change of business name.

These required business plans are used by responding agencies in the event of a release to allow for a quick and accurate evaluation of each situation. Businesses handling hazardous materials are required to verbally report any release or threatened release if there is a reasonable belief that the release poses a significant present or potential hazard to human health and safety, property, or the environment. In addition, if a release involves a federally-listed hazardous substance in an amount equal to or exceeding the reportable quantity, a notice must be filed with the California Office of Emergency Services within 15 days. The HHMD is responsible for conducting compliance inspections of regulated facilities in Los Angeles County.

Standardized Emergency Management System (SEMS). Established by authority of the California Emergency Services Act (ESA) (Cal. Gov. Code §§ 8574.1-8574.22), the SEMS is "the cornerstone of California's emergency response system and the fundamental structure for the response phase of emergency management" (*see* California Office of Emergency Services, *Standardized Emergency Management System*, available at *https://www.caloes.ca.gov/cal-oes-divisions/planning-preparedness/standardized-emergency-management-system* (accessed February 13, 2021). The system unifies all elements of California's emergency management community into a single integrated system and standardizes key elements. Emergency response in every California jurisdiction is handled in accordance with the SEMS, with individual County or City agencies and personnel taking on responsibilities as defined by the jurisdiction's Emergency Plan. This plan must describe the different levels of emergencies, the local emergency management organization, and the specific responsibilities of each participating agency, government office, and individual personnel.

The SEMS incorporates these components:

- *Incident Command System* – a field-level emergency response system based on management by objectives;
- *Multi/Inter-Agency Coordination* – affected agencies work together to coordinate allocations of resources and emergency response activities;
- *Mutual Aid* – a system for obtaining additional emergency resources from non-affected jurisdictions; and
- *Operational Area Concept* – County and its subdivisions must coordinate damage information, resource requests and emergency response.

The ESA requires SEMS for managing multiagency and multijurisdictional responses to emergencies in California. State agencies are required to use SEMS and local government entities must use SEMS in order to be eligible for any reimbursement of response-related costs under the state's disaster assistance programs.

Regional and Local Regulations

Los Angeles County Fire Department Health Hazardous Materials Division. The Health and Hazardous Materials Division (HHMD) is a division of the Fire Department's Prevention Services Bureau, and includes the following sections and units: inspection, emergency operations, special operations, and administration/planning. As noted above, the HHMD is the CUPA responsible for Los Angeles County programs, including the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program (Cal-ARP), the Aboveground Storage Tank Program and the Underground Storage Tank Program.

South Coast Air Quality Management District (SCAQMD) Rules 1166 and 1403. The SCAQMD is responsible for developing and implementing rules and regulations regarding air toxics on a local level. The SCAQMD establishes permitting requirements, inspects emission sources, and enforces measures through educational programs and/or fines (see South Coast Air Quality Management District, *South Coast AQMD Rule Book*, available at *http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book* (accessed February 13, 2021)). The Rules summarized below are included as Appendix D and are incorporated into this EIR by reference.

- **SCAQMD Rule 1166** (last amended 5/2001) sets the requirements to control the emission of volatile organic compounds (VOCs) from excavation, grading, or handling, as well as requirements for managing VOC-contaminated soil. Rule 1166 requires that "a person" who intends to excavate or grade VOC-contaminated soil must apply for, obtain, and operate pursuant to a VOC Contaminated Soil Mitigation Plan approved by the Executive Officer before beginning excavation or handling. The mitigation plan general requirements are specified in the Rule's Attachment A. A copy of the approved plan must be on site during the entire excavation period. There are specific requirements for VOC monitoring, soil stockpiling, treatment, and disposal, and maintaining ongoing communication with the SCAQMD.

- **SCAQMD Rule 1403** (last amended 10/5/2007) governs the demolition of buildings that contain asbestos-containing materials (ACM). Rule 1403 requires that the owner or operator of *any* (emphasis added) demolition or renovation activity shall survey the facility for the presence of asbestos before any demolition or renovation. Requirements include asbestos surveying, formal notification to SCAQMD, asbestos-containing material (ACM) removal procedures and time schedules, ACM handling and cleanup procedures, labeling, storage, and disposal requirements.
- **SCAQMD Rule 1466** (last amended 12/1/2017) addresses the control of particulate emissions from soils with toxic air contaminants. Rule 1466, with some exceptions, applies to any owner or operator who conducts earth-moving activities on designated site categories, or as designated by the SCAQMD Executive Officer. Requirements for notification and reporting, materials handling and disposal are specified. Table 1 of the Rule lists the applicable toxic air contaminants, which include materials such as arsenic, asbestos, dioxins, lead and lead compounds, and VOCs.

Enforcement of these rules is shared with the SCAQMD by the City of Azusa Building Department, which requires that an applicant for a demolition and/or building permit properly notify the SCAQMD, present the SCAQMD notification report, including remediation requirements, and a waste management plan, to the City. A demolition and building permit will not be issued unless these requirements are met. The building inspector assigned to the project enforces compliance in the field. (Ms. Summer Huval, City of Azusa Building Technician, *personal communication*, February 16, 2021).

Los Angeles County Office of Emergency Management. The Los Angeles County Office of Emergency Management manages the Emergency Operation Center (EOC) for the County's 88 cities, including Azusa, 137 unincorporated communities and 288 special districts (*see* Chief Executive Office, County of Los Angeles, *Emergency Management*, available at *https://ceo.lacounty.gov/emergency-management/* (accessed February 13, 2021).

City of Azusa General Plan. Chapters 3, 4, and 5 set forth various goals and policies regarding hazardous waste management, environmental hazards, and emergency preparation.

Chapter 3, *The Built Environment* sets forth wastewater treatment and facilities policies, as well as infrastructure implementation programs:

- Policy 3.8: Continue to monitor businesses that may generate hazardous waste to prevent contamination of water.
- Infrastructure Implementation Program 19:

  Implement the Source Reduction and Recycling programs and the Household Hazardous Waste Management programs.

  Solicit Federal funds to offset the City's fiscal impacts for implementing and enforcing these State mandated programs.

Chapter 4, *Economy and Community*, Goal 2, Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners, sets forth these policies:

- Policy 2.5: Require that new development be assessed a pro-rated fee to pay for fire facilities and personnel.

- Policy 2.6: Require all new development to design site plans and structures with fire and emergency access and safety in mind.
- Policy 2.7: Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.
- Policy 2.8: Continue to work with the LACFD to provide fire prevention, first aid, and lifesaving public education programs.

Chapter 5, *Natural Environment*, Goal 1 – Ensure the continued functioning of essential (critical, sensitive and high-occupancy) facilities following a disaster; help prevent loss of life from the failure of critical and sensitive facilities in an earthquake; and help prevent major problems for post-disaster response, such as difficult or hazardous evacuations or rescues, numerous injuries, and major cleanup or decontamination of hazardous materials.

City of Azusa Municipal Code

The Municipal Code includes regulations pertaining to proper handling, storage, and/or use of hazardous materials. Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*, is intended to protect the health and safety of the residents of the City and County by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the City from pollutants carried by stormwater and non-stormwater discharges. Violations are subject to civil and criminal enforcement (§§60-25 – 60-28).

Chapter 60 provisions addressing hazardous materials include:

- Section 60-8(b) – Prohibits disposing hazardous materials or wastes into trash containers used for municipal trash disposal.
- Section 60-10(4) – Prohibits discharge to the storm drain system from storage areas for materials containing grease, oil, or hazardous materials, or from uncovered receptacles containing hazardous materials, grease, or oil.
- Section 60-14 – Requires that a site manager/operator notify the City of any uncontrolled discharge into the storm drain system, to take action to contain or minimize the discharge, and to report in writing within 10 calendar days about the discharge cause, the efforts taken to stop and remediate the discharge, and measures to prevent future uncontrolled discharges.
- Section 60-15(3) – Prohibits storing of objects, such as motor vehicle parts, containing grease, oil, or other hazardous materials, and unsealed receptacles containing hazardous materials, in areas exposed to stormwater or otherwise susceptible to runoff.

City of Azusa Building Department. The Building Division requires permit applications for any new construction, including pre-construction demolition and site preparation. To obtain a demolition permit, an applicant must submit information about the scope of work, security fencing, any staging areas, items to be demolished, items to remain, and the method of demolition. Before receiving a permit, applicants must also:

- Submit evidence that they have formally notified the SCAQMD about the demolition, that they have complied with Rule 1403, and that they present a Certificate of Removal from the SCAQMD;
- Submit an erosion and sediment control plan for approval by the City Engineer;
- Submit a waste management plan that demonstrates how 65% of the project's waste stream will be recycled or otherwise diverted from landfills; and
- Obtain a truck route permit from the City Public Works department;
- Verify that utilities have been disconnected from the premises.

City of Azusa Local Hazard Mitigation Plan (HMPC). The HMPC identifies and profiles hazards that pose a risk to the City, assesses the vulnerability of the planning area to these hazards, and examines the existing capabilities to mitigate them. The City is vulnerable to numerous hazards that are identified, profiled, and analyzed in this plan. Dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events are among the hazards that can have a significant impact on the City. The HMPC is incorporated by reference into the City of Azusa General Plan.

City of Azusa Police Department – Office of Emergency Services. The Office of Emergency Services/Emergency Operations Center (EOC) is a component of the City Police department. This office plans and prepares for the possibility of a disaster, and conducts training, plan development, and community education. It regularly trains city personnel how to respond to disasters, in order to support field emergency personnel in their efforts to save lives, property, and the environment. When the City of Azusa EOC is activated during a disaster, it is staffed by department managers and city personnel familiar with city operations. Together, they manage and coordinate operations, receive and disseminate information from emergency personnel, expedite resource purchase and procurement, develop emergency policies and procedures, and provide emergency information and instruction to the public. The City participates in mutual aid agreements with neighboring jurisdictions, the Los Angeles County Operations Area, other pertinent federal and state agencies.

Regulated Chemicals and Materials

As discussed in Section 5.5.1, Environmental Setting, the Salem 2020 report indicates that the following materials have been associated with the project site and are likely to be present in harmful concentrations:

> ***Asbestos***. Asbestos is a fibrous mineral that was commonly used in household products and building materials prior to the 1980s. Asbestos fibers are considered hazardous when they break apart into a powder or dust (i.e., become "friable"), become airborne and can be inhaled. Asbestos exposure is a known cause of lung cancer, asbestosis, and bowel cancer (see U.S. EPA, *Asbestos*, available at *https://www.epa.gov/sites/production/files/2016-*

10/documents/asbestos.pdf (accessed February 15, 2021); DTSC, *Managing Asbestos Waste Fact Sheet*, available at *https://dtsc.ca.gov/managing-asbestos-waste-fact-sheet/* (accessed February 15, 2021).

The DTSC considers *non*-friable asbestos to be non-hazardous, and the RCRA does not characterize asbestos as hazardous per se. However, asbestos can be made friable during demolition if not properly handled; the primary non-industrial source of asbestos exposure is the demolition or remodeling of buildings that were constructed with asbestos containing materials. Because friable asbestos is airborne, it is regulated by air quality management or pollution control districts (see South Coast Air Quality Management District, Rule 1403, above). Asbestos is considered toxic at a concentration of 1 mg/kg (22 CCR § 66261.24, *Characteristic of Toxicity*, available at *https://govt.westlaw.com/calregs/Document/I07DBE58C0F8C446C9715168D2C88CC9E?transitionType=Default&contextData=%28sc.Default%29* (accessed February 15, 2021).

Lead. Lead is a naturally-occurring element found in the Earth's crust, and has been used for many years in paints, automotive fuels, solder, plumbing products, batteries, ammunition, and cosmetics. Lead adheres to soil particles and can move into groundwater. Exposure to lead causes various health effects, including brain damage in children and cardiovascular and kidney damage in adults (see U.S. EPA, *Lead Compounds*, available at *https://www.epa.gov/sites/production/files/2016-09/documents/lead-compounds.pdf* (accessed February 15, 2021). California's regulatory threshold for lead is 5 mg/l; toxicity levels for lead are set at a soluble concentration of 5 mg/l, and at a total wet-weight concentration of 1,000 mg/kg (22 CCR § 66261.24, Tables I and II).

Trichloroethylene (TCE). TCE, a VOC, is an industrial solvent used primarily for degreasing metal parts, as well as for extracting greases, fats, oils, etc. It is moderately soluble in water. Health effects include cancer, as well as liver, kidney and central nervous system effects (see U.S. EPA, *Trichloroethylene*, available at *https://www.epa.gov/ sites/production/files/2016-09/documents/trichloroethylene.pdf* (accessed February 15, 2021). California's regulatory threshold for TCE is 0.5 mg/l, and toxicity levels are set at a soluble concentration of 204 mg/l and a total wet-weight concentration of 2,040 mg/kg (22 CCR § 66261.24, Tables I and III).

Tetrachloroethylene (PCE). PCE, a VOC, is an industrial solvent typically used for de-greasing, and is used in dry-cleaning and spot-removal agents. It is colorless, has a "sweet" odor, and does not degrade naturally in the environment. Health effects associated with PCE include cancer, as well as impaired cognitive and motor function, and liver and kidney damage). (see U.S. EPA, *Tetrachloroethylene*, available at *https://www.epa.gov/sites/production/files/2016-09/documents/tetrachloroethylene.pdf* (accessed February 15, 2021). California's regulatory threshold for PCE is 0.7 mg/l (22 CCR § 66261.24, Table I).

Radon. Radon is a naturally occurring gaseous substance resulting from the radioactive decay of uranium to radium and then to radon. Uranium is a common element found in many geologic formations and substrates, particularly igneous and metamorphic rocks. Radon has a half-life of only 3.8 days and decays to its daughter elements (polonium 218, polonium 214, bismuth 214, and lead 214). It is these daughter elements that represent the health hazard commonly

associated with radon. Radon gas can enter a building through cracks in the foundation and walls and become attached to dust particles and inhaled which could cause damage to human lung tissue. Radon is measured in picocuries per liter of air (pCi/L). The EPA has an established safe radon level of 4 pCi/L.

Based on the EPA Radon Zone Map of California, the subject Property is located within EPA Zone 2, which has a predicted indoor radon screening between 2 pCi/L and 4pCi/L. The EDR-provided radon data cites Los Angeles County as having 98% of 1st floor spaces with <4 pCi/L. However, radon levels may vary from one area to another and the only way to accurately assess radon gas levels on the subject property is to conduct a radon gas survey (Salem 2020, p. 31).

5.4.3 CEQA Significance Criteria

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the CEQA Guidelines, as amended, and used by the City in its environmental review process. The Initial Study Checklist includes questions relating to hazards and hazardous materials. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident considerations involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?
- 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?
- For a project located within 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 result in a safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Based on these significance thresholds and criteria, the Project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts that are not already addressed by existing regulations. If a potentially significant impact cannot be reduced to a less-than-significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

5.4.4 Impact Discussion

HAZ-1 Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The proposed project would not involve the *routine* transport, use or disposal of hazardous substances, because the project would construct a storage warehouse that is not intended to use or house hazardous materials. However, because site preparation would require demolishing and removing buildings and site infrastructure that could contain hazardous materials, such as asbestos, lead paint or VOC-contaminated soils, transport of such materials to a permitted disposal facility would be necessary. Prior to obtaining demolition, grading, and building permits, the City of Azusa requires that applicants submit evidence of the presence or absence of hazardous materials on a project site. If such materials are identified, then demolition, treatment and disposition would be regulated by the SCAQMD Rules 1166, 1403, and 1466 cited above and included as Appendix D. Transport of hazardous materials would be subject to the requirements of the RCRA, California Health and Safety Code Chapter 6.5 and Title 22, Division 4.4 of the California Code of Regulations as cited above. Depending on the nature and volume of material to be disposed, demolition would also be subject to the requirements of the Hazardous Materials Disclosure Program. The City Building Inspector, the Los Angeles County Fire Department, the SCAQMD, EPA, and CalEPA have enforcement authority to ensure compliance. With compliance, hazards to the public and the environment would be less than significant. No additional mitigation measures are required.

HAZ-2 Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident considerations involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. As discussed in Environmental Setting, above, the project site overlies a region of known groundwater contamination that has been identified in the EPA National Priority List, and various contaminants have been shown to persist on the property. Demolition of pre-1970s structures, site preparation, and construction could potentially expose construction workers and the public to hazardous substances present in the existing structures or on-site soils, including asbestos, lead, and VOCs. There is also a slight possibility that radon is present in the area. As further discussed below, both existing regulations and application of Mitigation Measures Haz-1-5 would reduce exposure to hazardous materials to less-than-significant levels.

d. ***Impacts Associated with VOC-contaminated soils:*** **Less Than Significant with Mitigation Measures Incorporated.** The Phase I Environmental Site Assessment (ESA) prepared for the project (Salem 2020, cited previously and included as Appendix C) documents multiple occurrences of soil contamination with VOCs, metals, and diesel fuel on the property (see Salem 2020, pp. 8-1 – 9-4). In response to prior site investigations, various remedial actions have been taken, including removal of underground storage tanks and subsoil, removal of metal-containing soils, removal of concrete clarifiers, and removal of solvents. These actions accomplished substantial cleanup of the site. However, VOCs are still present on a 3.19-acre portion of the site underlying Buildings 1, 2, 3, and 4 (id., p. 16). A deed restriction was placed on the property in

2019, preventing it from being used for school or residential purposes because remaining soil VOCs exceed DTSC-determined safe levels for those uses.

The DTSC has since revised its regulatory guidelines for commercial uses, lowering threshold values. At this time, the Salem report suggests that PCE and TCE levels in soil vapor at the site may exceed the current DTSC regulatory guidelines (id., pp. 29-30). During demolition and site preparation, these materials could be released, thus posing a hazard to the public and the environment, and during project operation, soil vapors could migrate into the interior of the proposed warehouse.

Accordingly, to determine current VOC levels in project soils, and the extent of soil mitigation required, a Phase II ESA would be required, which includes testing and project-specific recommendations for remediation. **Mitigation Measure Haz-1** below requires a Phase II ESA to be prepared according to current American Society for Testing and Materials (ASTM International) standards.

If the site is found to contain VOCs over regulatory levels, SCAQMD Rules 1166 and 1466 require that owners/operators of VOC-containing sites notify the SCAQMD and prepare a VOC Contaminated Soil Mitigation Plan for SCAQMD approval before excavation or grading begins. Plan implementation would minimize worker and public exposure to VOCs during construction. The City of Azusa requires evidence of such notification and compliance before issuing building permits, including grading permits.

The Phase I ESA advises that a Soil Management Plan (SMP) be prepared prior to site development. If an SMP is not a required part of the VOC Contaminated Soil Mitigation Plan, and/or if the SCAQMD does not require a VOC-Contaminated Soil Mitigation Plan, then the applicant shall prepare a Soil Management Plan to the satisfaction of the City of Azusa Building Division and the Los Angeles County Fire Department Health Hazardous Materials Division. **Mitigation Measure Haz-2** below requires preparing an SMP and implementing its recommendations.

As noted above, the Phase I ESA identified the potential for vapor intrusion into the finished warehouse (Salem 2020, pp. 29-30). To minimize harm to warehouse workers, the applicant shall implement measures to prevent or to remove soil-borne vapors from the interior of the warehouse. The Phase I ESA indicates that the applicant will commit to a vapor mitigation system. **Mitigation Measure Haz-3** requires that the applicant install a vapor mitigation system to reduce interior vapors to below levels recognized as safe.

e. ***Impacts Associated with Asbestos Exposure:*** **Less Than Significant .** Because the structures to be demolished on the site were constructed in the late 1950s to early 1960s, they likely contain asbestos (Salem 2020, p. 30). During demolition, asbestos could be released to the environment and pose a health risk if not handled and disposed of properly. As discussed above, before the City Building Division will issue demolition and building permits, the applicant must notify the SCAQMD about the proposed demolition, and prove to the Division's satisfaction that the SCAQMD has approved demolition plans. This process ensures that the applicant complies with the SCAQMD Rule 1403 for asbestos surveying, handling, and disposal. Because Rule 1403 has been developed to minimize public exposure to asbestos and associated harms, and because

compliance is enforced by both the SCAQMD and the City, no additional mitigation for asbestos impacts is required.

f. ***Impacts Associated with Lead Exposure: Less Than Significant with Mitigation Measures Incorporated.*** Because the structures to be demolished on the site were constructed in the late 1950s to early 1960s, they are also likely to have surfaces coated with lead-based paint (LBP) (Salem 2020, pp.30-31). During demolition, lead compounds could be released into the environment and pose a health risk if not handled and disposed of properly. **Mitigation Measure Haz-1** requires that the applicant conduct an LBP survey as part of a Phase II ESA to identify and to provide recommended remediation prior to demolition activities, and that the applicant comply with those recommendations prior to obtaining a demolition permit. With implementation of this mitigation measure, LBP would be removed from the property and appropriately disposed in a permitted facility.

g. ***Impacts Associated with Radon Exposure:*** **Less Than Significant with Mitigation Measures Incorporated.** The EPA Radon Zone Map of California shows that the subject Property is located within EPA Zone 2, which has a predicted indoor radon screening between 2 pCi/L and 4pCi/L, near the EPA-determined safe levels for radon exposure of 4pCi/L (Salem 2020, p. 31). Radon data cited in the Phase I Geotechnical Study indicates that 98% of 1st floor spaces in Los Angeles County have radon levels that are less than 4 pCi/L (id.). However, radon levels may vary from one area to another, and the only way to assess radon gas levels accurately on the subject property is to conduct a radon gas survey. Accordingly, **Mitigation Measure Haz-1** requires that the applicant perform a radon gas survey as part of a Phase II ESA before building/demolition permits are issued, and to implement the recommended mitigation measures, if any, to the satisfaction of the Building Division.

HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?

Less Than Significant Impact. There are no existing or known proposed schools within one-quarter mile of the project site (Dean Flores, Assistant Planner, pers. comm., April 20, 2021) . All land uses within a one-quarter-mile radius of the project boundary are industrial, commercial, or open space (Santa Fe Dam Recreation Area). Impacts would be less than significant.

HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The project site is not listed in the current CalEPA Cortese list of active sites (where actions pursuant to cleanup or abatement orders have not been completed) (see CalEPA, Cortese List: Section 65962.5(c), available at *https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/* (list of properties is available as an Excel spreadsheet available for download)(accessed February 19, 2021). Impacts related to potential hazardous material releases are addressed in Haz-2 above.

HAZ-5 For a project located within 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 result in a safety hazard for people residing or working in the project area?

No Impact. The proposed project is not located within an airport land use plan, and there are no public airports or public use airports located within two miles of the City of Azusa (the nearest public airport to the City is the Ontario International Airport, approximately 18 miles to the east). Accordingly, the project would not result in an airport-related safety hazard or subject people working on the project site to excessive noise from airport uses.

HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The proposed project would not affect implementation of the City of Azusa's emergency response plans, because project development would not require street closures or other interference with emergency access. Moreover, building construction and site layout must meet Fire Code standards for access and egress. Site plans and construction plans are subject to review by the Los Angeles County Fire Department, and will not be approved without adequate access for fire-suppression equipment.

HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The proposed project is not expected to expose people or structures to significant risk of loss from wildland fire, because the surrounding area to the north, south and east is developed with industrial uses, and the property is separated from open space land in the Santa Fe Dam Recreational Area to the west by a levee and railroad embankment that do not support wildland vegetation. The property itself is not in a mapped high fire severity zone. However, because the property is located in the City of Azusa, at the base of the San Gabriel Mountains where wildland fires are commonplace, indirect injury to workers could be caused by smoke inhalation. Still, the potential for injury from wildfire smoke would be similar for all present within the region, and project development by itself would not increase this potential since the project site has been previously developed for industrial uses, and is surrounded by existing development. Impacts related to wildland fire risk are accordingly anticipated to be less than significant.

5.4.5 Mitigation Measures

Mitigation Measure Haz-1: Phase II Environmental Site Analysis (ESA). Prior to issuance of building permits, including grading and demolition permits, the applicant shall conduct a Phase II ESA according to the most current ASTM E 1903 *Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process*, to include but not be limited to VOC levels, asbestos, lead-based paint, and radon. The Phase II ESA and remediation studies and plans shall be completed by an environmental investigator(s) specifically licensed and qualified to meet the responsibilities for the issue(s) of concern. Licensing and qualifications shall be listed and explained in the Phase II ESA Report.

The applicant shall also implement remediation measures as recommended in the Phase II ESA to the satisfaction of the City Building Division, SCAQMD, and the DTSC and/or the Los Angeles County Fire Department Hazardous Materials Division (depending upon which of the two oversight agencies, the LAFD and the DTSC, assumes oversight responsibility).

Remediation measures in the Phase II ESA shall conform to the relevant ASTM Guides and Practices and the California DTSC's current vapor intrusion mitigation advisory document for removing contaminants or reducing site contamination to safe levels (2011 edition is available at *https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/VIMA_Final_Oct_20111.pdf*; 2021 edition is in progress). Such measures may include, but not be limited to:

- **Vapor Intrusion Analysis** and subsequent installation of vapor barriers (concrete or geotextile), and/or a vapor intrusion system (required in MM Haz-3 below);
- **Operations and Maintenance (O&M) Plan** for managing site contamination and remediation equipment;
- **Hard Cap Engineering Controls** (concrete barrier under building slab, vapor extraction system, etc.) and/or institutional controls (restrictive covenants, access restrictions);
- **Soil Management Plan**; and
- Other measures as recommended by the environmental investigator.

Mitigation Measure Haz-2: **Soil Management Plan.** Prior to issuance of building permits, including grading and demolition permits, the applicant shall prepare and implement a Soil Management Plan to the satisfaction of the City Building Division, SCAQMD, and the DTSC/LAFD.

The Soil Management Plan shall include but not be limited to:

- A site-specific construction health and safety plan that addresses the potential hazards from exposure to on-site contaminants, including a schedule for on-site training meetings, field auditing, requirements for personal protective equipment (PPE), and training and assigning a field safety officer to supervise and enforce compliance;
- Designation of contaminated soil perimeters as identified in the Phase II ESA;
- Requirements for grading and stockpiling potentially-contaminated soil;
- Requirements for testing and disposal of contaminated soil;
- Sampling strategies for determining when contamination is no longer present in site soils that could be encountered by construction workers or warehouse personnel;
- Backfilling protocols, including safety requirements for fill soil;
- A list of contact information, including direct telephone numbers to individuals, agencies and businesses associated with the project, particularly the environmental professional, the site foreman, the construction manager, excavation contractor, etc.

A paper copy of the Soil Management Plan shall be retained on-site through project construction.

Mitigation Measure Haz-3: **Vapor Intrusion (VI) Mitigation System.** Prior to issuance of building permits, including grading and demolition permits, the applicant shall submit engineered plans showing a vapor intrusion mitigation system to reduce baseline indoor VOC vapor fractions to levels at least 10%

below regulatory minimums. The system shall conform to the most recent DTSC Vapor Intrusion Mitigation Advisory documentation (2011 Advisory available here: *https://dtsc.ca.gov/wpcontent/uploads/sites/31/2016/ 01/VIMA_Final_Oct_20111.pdf*, accessed March 17, 2021).

The City Building Official shall not issue a building permit until the system's estimated performance is validated by a registered professional engineer or environmental specialist with specific expertise in such systems, and the system is approved by the responsible agency (LAFD or DTSC). The City Building Official shall not issue an occupancy permit until the responsible agency has confirmed in writing that the system has been tested by the above-referenced professional, is functioning as designed, and has reduced interior vapor levels to 10% or more below regulatory minimums.

The VI system shall include appropriate indoor gas-monitoring devices with alarms that sound if VOC concentrations rise to regulatory minimums. Components of the system shall include but not be limited to:

- *Operations and Maintenance (O&M) Plan*;
- *Reporting Plan* (for reporting to DTSC or the LAFD, depending on which agency assumes oversight);
- Inspections at frequency recommended by DTSC or LAFD;
- *Enforceable Mechanism*: the site owner/operator shall enter into an enforceable mechanism to address DTSC or LAFD oversight and cost recovery, e.g., a corrective action consent agreement, consent order, consent agreement, voluntary cleanup agreement, and an O&M agreement;
- *Financial Assurance*: The responsible party or site owner/operator shall establish and maintain a financial assurance mechanism for costs associated with implementation of the VI mitigation response action, O&M activities, land use covenant (LUC) compliance, five-year reviews, and DTSC/LAFD oversight;
- *Access Agreement*: The site owner/operator shall permit access at any time to DTSC/LAFD personnel for inspection and monitoring.
- *Institutional Control*: Prior to building occupancy, the responsible party (current site owner) shall record with the Los Angeles County Registrar/Recorder a Land Use Covenant to Restrict Use of Property, Environmental Restriction (LUC) with prescribed notifications, prohibitions, and engineering controls to ensure O&M and disclosure to future buyers and occupants. The LUC shall also contain a requirement to perform a Five-Year-Review if hazardous substances remain at the site above levels that would preclude unrestricted land use. The purpose of the five-year review is to ensure that the response action 1) remains protective of human health and the environment, 2) is functioning as designed, and 3) is maintained with appropriate O&M activities;
- *Termination of Building Controls*. Subsurface remediation efforts will eventually reduce volatile chemical concentrations in soil, soil gas, and/or groundwater to levels that no longer require mitigation. At this point, the VI mitigation system may be shut down and/or removed and O&M requirements will cease. The implementation plan for the VI mitigation system shall include specific provisions for determining that subsurface remediation is complete and that the VI mitigation system is no longer needed. A confirmation sampling

and analysis plan for soil, soil gas, and/or groundwater shall be submitted to the City and LAFD/DTSC.

5.4.6 Significance After Mitigation

With the above mitigation measures in place, impacts related to hazards and hazardous materials are anticipated to be ***less than significant.***

5.4.7 Cumulative Impacts

Because the project would be required to remediate the site's contaminants, it would reduce the site's contribution to the overall hazardous material presence in the area. Cumulative impacts are thus expected to be ***less than significant***.

5.5 Transportation and Circulation

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5.5 Transportation and Circulation

5.5.1 Environmental Setting

Existing Circulation System. The City's street system comprises a modified grid that is bisected by the east-west I-210 freeway. The project site on S. Motor Avenue, lies within the City's southwestern quadrant, one block west of N. Irwindale Avenue, and one-half block north of Gladstone Avenue. Irwindale Avenue, a principal arterial, runs in a north-south direction east of the project site. Gladstone Avenue, a secondary arterial, runs east to west south of the project site; Arrow Highway, also a principal arterial, runs east-to-west approximately one-half mile south of the project site. Motor Avenue is considered a local street. (City of Azusa General Plan, Fig. M-1, p. 3-58, Street Classifications, available at *https://www.ci.azusa.ca.us/DocumentCenter/View/218/Chapter-3?bidId=* (accessed February 1, 2021)).

Existing Transit Service. The project site is currently served by Foothill Transit, a public transit agency serving 21 member cities in San Gabriel and Pomona Valleys, which include Azusa and Irwindale. Foothill Transit Route 185, which runs along Irwindale Avenue at ±30-minute intervals, with stops at Irwindale and Gladstone, connects the project site with the Los Angeles Metro Gold Line Irwindale station, approximately one mile north of the project site. Foothill Transit Routes 187 along Foothill Boulevard and 492 along Arrow Highway indirectly serve the project site. Additionally, the City of Azusa operates a limited on-demand transit service for Azusa *residents*, including a Dial-A-Ride service for disabled and/or age 55+ residents, and an on-demand Gold Line shuttle.

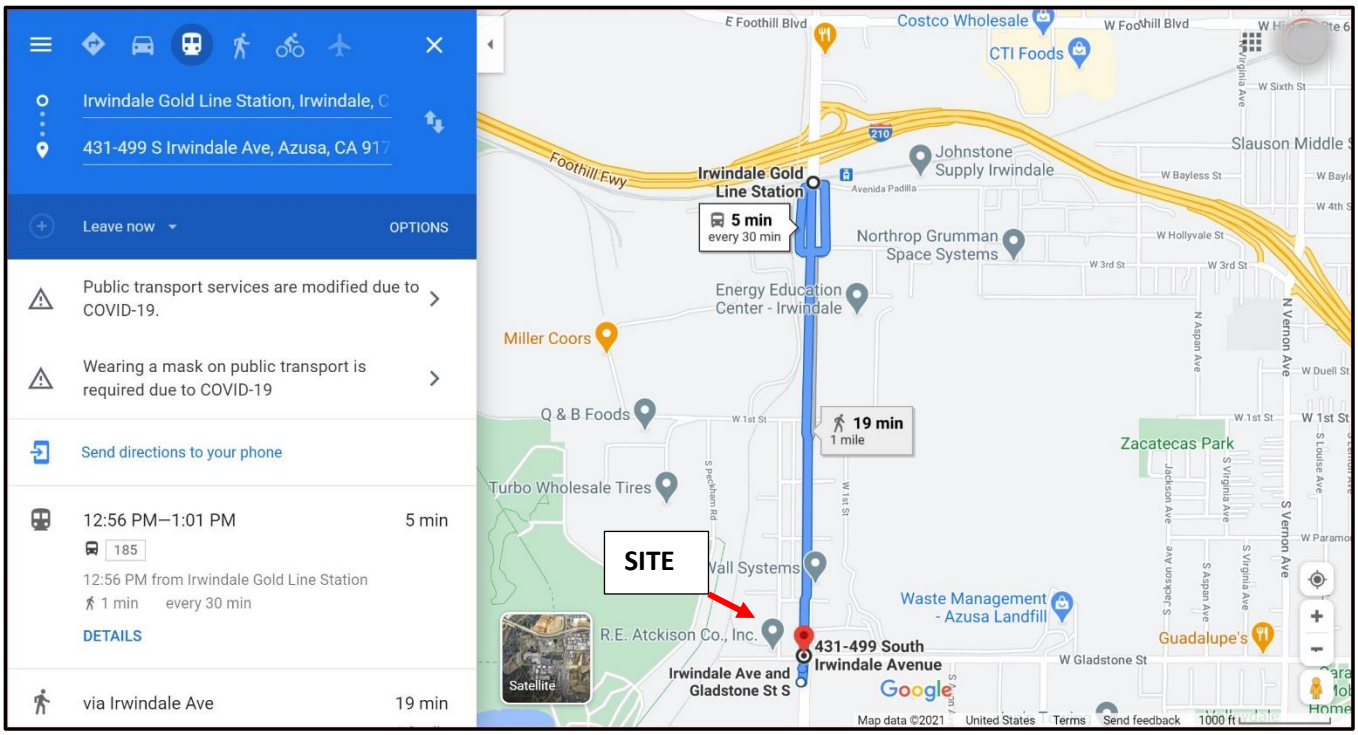


Figure 26 Foothill Transit Route 185

Existing Bicycle Facilities. Figure 27 below shows bicycle routes in the City (City of Azusa General Plan, Fig. M-2, p. 3-60, available at *https://www.ci.azusa.ca.us/DocumentCenter/View/218/Chapter-3?bidId=* (accessed February 1, 2021). A Class III (signed) route serves the project site along Gladstone Ave., and Class II bicycle lanes exist nearby along Arrow Hwy., Vincent Ave., and First St. The San Gabriel River Trail west of the project site has no direct connection to it, but can be accessed at Arrow Highway and Azusa Canyon Rd., approximately one road mile southwest of the project site (path measured along Irwindale Ave. and Arrow Hwy).

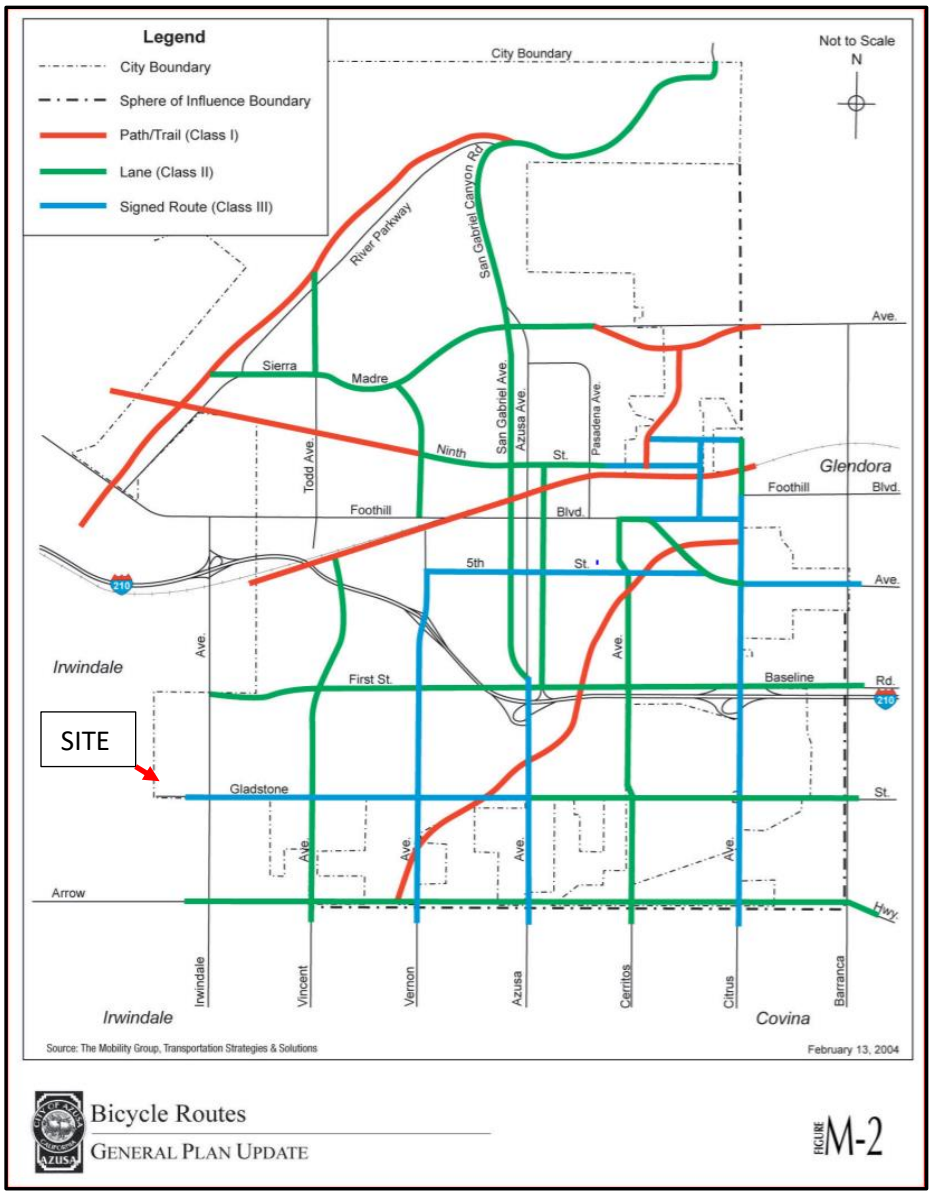


Figure 27 City Bicycle Routes

***Truck Routes*.** Figure M-4 in the Azusa General Plan shows truck routes within the City (id., Fig. M-4, p. 3-64, available at *https://www.ci.azusa.ca.us/DocumentCenter/View/218/Chapter-3?bidId=* (accessed February 1, 2021). Routes near the project site include Irwindale Avenue, Arrow Highway, Vincent Avenue, and First Street. Foothill Boulevard and North Irwindale Avenue are also designated truck routes in the adjacent City of Irwindale.

5.5.2 Regulatory Setting

CEQA Standard for Transportation Impacts

New Standard for Transportation Impacts. On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which initiated a process to change transportation impact analyses completed in support of CEQA documentation. SB 743 eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, vehicle miles traveled (VMT). As a result, the State has shifted from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation.

CEQA § 21099(b)(2), which states in part that "automobile delay . . . shall not be considered a significant impact on the environment," brought SB 743's VMT standard into CEQA analysis. When transportation impacts were measured by LOS – street and intersection function – they were typically mitigated by adding street or freeway lanes, restriping streets, changing signal timing, etc., ultimately facilitating driving and increasing congestion, with concurrent air quality and GHG impacts. In 2018, the CEQA Guidelines were comprehensively amended to incorporate VMT, establishing new transportation thresholds that became effective on July 1, 2020. CEQA Guidelines § 15064.3, Determining the Significance of Transportation Impacts, sets forth VMT as the new metric. For land use projects, projected VMT that exceed an adopted significance threshold generally constitute a significant impact.

City of Azusa Transportation Policies and Regulations

City of Azusa General Plan. The General Plan sets forth various policies with respect to the circulation system:

- **Policy 1.3:** Require the cost of improvements to the existing circulation system and new circulation system necessitated by new development to be borne by that development that gains benefit.
- **Policy 2.1:** Improve the street system by extending and connecting the street grid in the southwestern area of the city including but not limited to, a new north-south roadway by extending Vincent Avenue from Gladstone Street to Todd Avenue; extending First Street from Vernon Avenue to Irwindale Avenue; and constructing a new interchange with I-210 in the vicinity of Zachary Padilla Avenue.
- **Policy 3.4:** Develop and maintain a citywide bicycle network of both on-street bike lanes and off -street bike paths in accordance with the Bicycle Routes (Figure M-2). The network provides for off -street paths along the San Gabriel River, railroad rights-of-way, alongside flood control channels, and within existing and new neighborhoods, where feasible. The network improves

connections between residential neighborhoods, schools, and commercial centers, as well as providing connections to citywide destinations such as Downtown, the University District, the San Gabriel River, and Civic Center.

- **Policy 3.5:** Provide bicycle amenities (bicycle parking spaces, bike lockers, etc.) on/near the bicycle network.
- **Policy 8.1:** Plan for an adequate amount, not an oversupply, of parking for autos, carpool vans, and bicycles for each land use.
- **Policy 8.4:** Plan land uses and design buildings to encourage transit, rideshare or carpool, bicycling, and walking. This includes but is not limited to:
    - Permitting higher densities along transit corridors and around transit stations;
    - Allowing a mix of uses to include residential and commercial uses in the same area in order to reduce the number of vehicular trips made;
    - Locating and designing new developments to encourage access by nonauto modes;
    - Requiring new development to provide direct and convenient pedestrian access to transit and adjacent land uses within walking distances;
    - Requiring the provision of transit facilities/amenities in larger scale developments;
    - Along corridors, requiring off street parking to be located behind buildings so barriers to pedestrians and transit users are not created between the building and the street; and locating buildings close to the street to be inviting to pedestrians and transit users, as appropriate.
- **Policy 8.6**: Promote the use of Transportation Demand Management (TDM) programs to encourage the use of transit, ridesharing, and non-motorized modes for travel both within the City and outside of the City.

***City of Azusa Development Code*.** The City of Azusa Development Code sets forth the following transportation-related provisions for new development:

- **Section 88.36.050, *Number of Parking Spaces Required***, Table 3-7, requires that warehouses used exclusively for storage provide one space for each 1,000 square feet of warehouse area, and one space for each 300 square feet of office use.
- **Section 88.36.070, *Bicycle and Motorcycle Parking*** requires a minimum of one bicycle spaces for every 20 motor vehicle spaces, up to 100 spaces, and one motorcycle space for each 50 motor-vehicle spaces.
- **Section 88.36.090, *Parking Design and Development Standards*,** requires in part the following:
    - *Access to Parking.* Access to parking shall be provided as follows, except for individual single-family dwellings, which are exempt from the requirements of this subsection B. Site design shall minimize the amount of paved surface and driveway length while providing for safe and suitable access for vehicular circulation.
        1. *Street Access Points*. Parking areas shall provide suitable maneuvering area so that vehicles exit to a street in a forward direction. Parking lots shall be designed to prevent access at any point other than at designated access drives.

2. *Queuing*. A commercial or industrial use that is designed to provide 20 or more parking spaces shall have access driveways that are not intersected by a parking aisle, parking space, or another access driveway for a minimum distance of 20 feet from the street right-of-way, to provide a queuing area for vehicles entering and exiting the parking area.

- **Section 88.36.100**, *Driveways and Site Access,* requires that each driveway providing site access from a street, alley, or other public right-of-way shall be designed, constructed, and permanently maintained; for commercial projects, driveways shall be limited to the lowest-volume street to minimize impacts where a project has more than one street frontage, and shall provide at least 20 feet from the street right-of-way to allow on-site queuing so that streets are not blocked. Driveways must also be spaced at least three feet from the nearest property line, the centerline of a fire hydrant, light standard, traffic signal, utility pole, or other similar facility.

5.5.3 City of Azusa VMT Threshold

The City's baseline VMT is 20.5 per capita for home-based work. "Home-based work" means the average number of employee commute trips between home and work (not "remote work" conducted in a "home"). The City sets its significance threshold at 15 percent below baseline, or 17.4. Accordingly, if a project is estimated to generate more than 17.4 VMT per capita, it will result in significant transportation impacts.

5.5.4 CEQA Significance Criteria

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the CEQA Guidelines, as amended, and used by the City in its environmental review process. The Initial Study Checklist includes questions relating to greenhouse gas emissions. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) (Criteria for Analyzing Transportation Impacts);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

Based on these significance thresholds and criteria, the Project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less-than-significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

5.5.5 Impact Analysis

TRANS-1 Would the project conflict with a program, plan, ordinance, or policy addressing the circulation *system*, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The proposed warehouse project would not conflict with programs, plans or regulations addressing the circulation system or public transit, in part because the project is a stand-alone land development that would not prevent the City of Azusa from implementing circulation system programming, such as improving alternative transportation, building sidewalks, and enhancing roadways.

Site development is subject to the City's Development Code provisions which require that the project provide a minimum number of vehicle, bicycle, and motorcycle parking spaces and provide safe and unobstructed driveway access to the public right-of-way. Projects must also incorporate adequate queuing space so that incoming vehicles do not block the public right-of-way.

As shown on the proposed project's site plans, the project proposes a 91,000 square-foot warehouse with 3,403 square feet of office space, which would require a minimum 109 vehicle spaces, and six bicycle spaces. The project would provide 110 spaces, including 11 carpool/vanpool spaces and seven zero-emission vehicle spaces. The project would also provide six bicycle spaces and three motorcycle spaces. The number of proposed spaces meets or exceeds code requirements.

The project provides two driveways accessing Motor Avenue. The northernmost driveway measures 35 feet wide, with 20-foot driveway-apron radii, and is approximately 50 feet south of the intersection of Motor Avenue and W. Roosevelt Street. The southernmost driveway is approximately 160 feet north of the intersection of Motor Avenue and Gladstone Street, measures 28 feet wide, and proposes 20-foot driveway apron radii. Both driveways show 33 feet of queuing space from the Motor Avenue right-of-way. These dimensions exceed the ordinance requirements specified above.

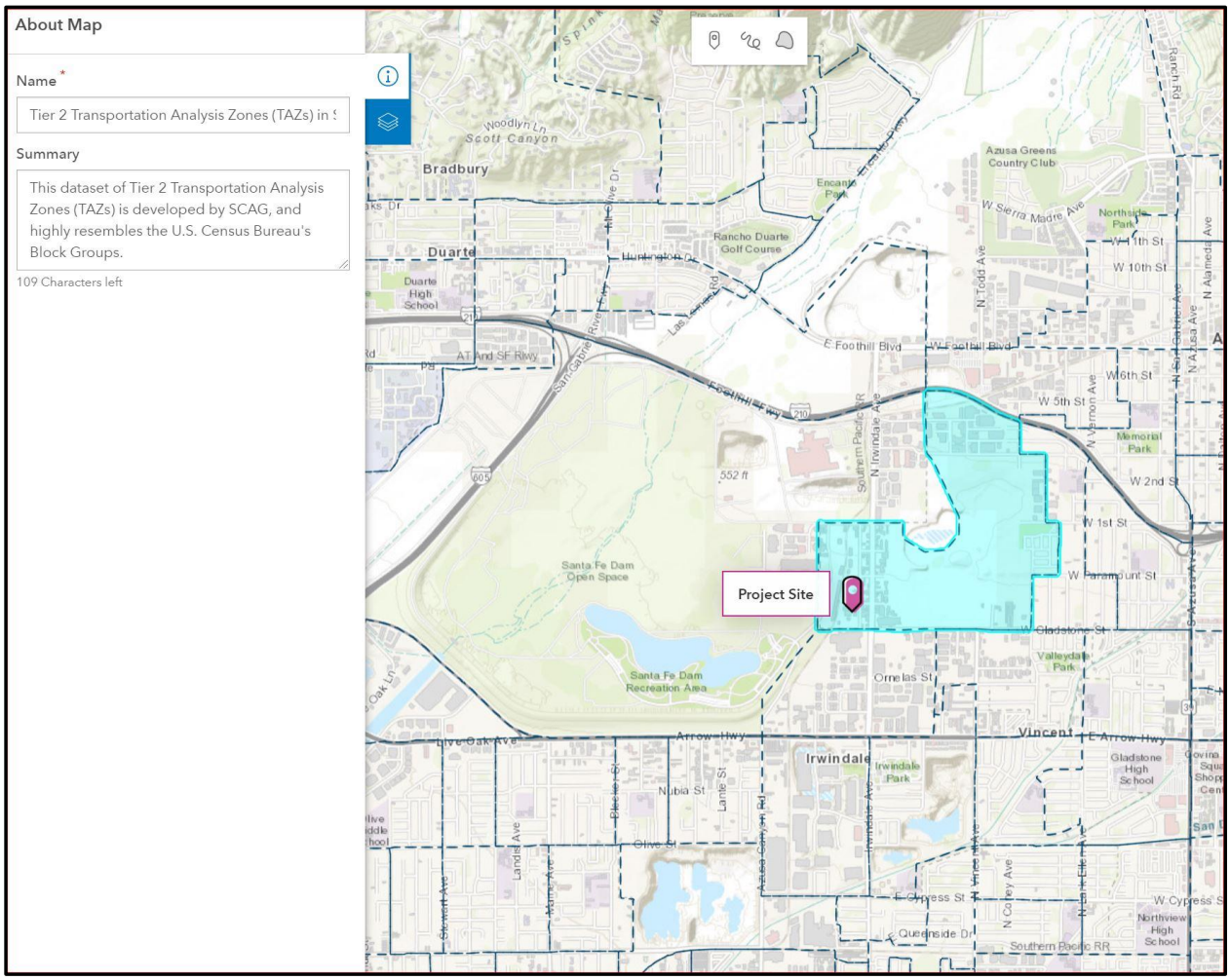
There are Foothill Transit stops one block east of the project site at the southwest corner and northeast corner of the intersection of Irwindale Avenue and Gladstone Avenue. Project implementation would not physically affect these stops because project construction activity would not extend beyond the project site.

TRANS-2 Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) (Criteria for Analyzing Transportation Impacts)

(Note: this section relies on Fehr & Peers, Azusa Rexford Industrial Project: Vehicle Miles Traveled Analysis (VMT Analysis) (February 3, 2021), incorporated by reference into this EIR.)

Significant and Unavoidable Impact. VMT from the proposed project are estimated to be greater than 15% of the City's baseline VMT, thus resulting in a significant impact. The SGVCOG VMT Evaluation Tool was used to estimate the City of Azusa's baseline VMT so that the City's significance threshold could be applied to the project. This evaluation tool is based on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) trip-based model. The current SCAG model has a 2012 base year, a 2016 scenario, and 2040 as the forecast year (*see* Southern California Association of Governments, *Trip Based Model: Existing Travel Demand Model*, available at *https://scag.ca.gov/trip-based-model*, accessed February 5, 2021). The

model divides the region into Transportation Analysis Zones (TAZs), identifying 4,109 tier 1 (sub-regional) zones and 11,267 tier 2 (micro) zones, and incorporates socioeconomic information from U. S. Census tract data. Figure 28 shows the Tier 2 TAZs in the project vicinity.



Source: Southern California Association of Governments, Tier 2 Transporation Analysis Zones, available at https://gisdata-scag.opendata.arcgis.com/maps/edit?content=SCAG%3A%3Atier-2-transportation-analysis-zones-tazs-in-scag (accessed February 9, 2021)

Figure 28 TAZ Zones in Project Area

The VMT analysis for this project was based on year 2016 results. This baseline VMT methodology reflects vehicle trips within the SCAG model to generate the "home-based work" VMT per employee metric. Under this approach, vehicle trips between home and work are counted, and then divided by the number of employees within the geographic area. This metric is used to estimate employee VMT for uses such as manufacturing, warehousing, and areas associated with offices or administrative functions. Model results identified the City's baseline VMT to be 20.5, with a VMT impact threshold of 17.4, 15% less than the baseline (corresponding to the City's adopted significance threshold).

The warehouse is projected to employ **49** workers, based on a rate of 0.5 employees per thousand square feet.[5]

The average per-person trip rate of **1.75** was obtained from the SCAG travel model for warehouse uses located within the TAZ encompassing the project site; total employee trips are calculated as follows:

49 employees x 1.75 trips/employee = 85.75 total "person trips" (rounded up to 86)

For warehouse employees, 80% of total trips (69 trips) were assumed to occur in vehicles occupied by one person (SOV trips) and 14% of total trips (12 trips) in vehicles occupied by an average of two people (HOV trips). The remaining 6% of total trips (5 trips) was estimated to use alternative (ALT) modes such as walking, biking, or transit. These latter trips were not included in the VMT modeling.

Vehicle trips were calculated as follows:

(86 person trips x 0.80 SOV) + (86 person trips x 0.14 HOV)/2.0 persons per HOV = 75 *vehicle* trips

86 person trips x 0.06 ALT = 5 *alternative-transportation* trips

Based on these trip rates and the estimated "mode split," i.e., the distribution of trips between those taken by individuals traveling alone and those carpooling, the Project is estimated to generate 75 vehicle trips, encompassing 81 daily person-trips in vehicles, and five alternative transportation trips. The VMT analysis rounded 75 to 76 to be conservative and to balance daily in/out employee vehicle trips.

Commute trip lengths were estimated using 2016 SCAG model data, incorporating average trip lengths for each TAZ in the City of Azusa. For the TAZ where the proposed project is located, the average commute trip length was estimated at **17.9** miles.

Total daily employee VMT were obtained by multiplying the estimated number of vehicle trips by the average trip length in the TAZ: **76 x 17.9 = 1,360**. The warehouse is projected to employ **49** people. VMT per capita is thus estimated to be **1,360/49 = 27.8.** Table Trans-1 summarizes the commute VMT calculation.

The projected VMT, at 27.8, is greater by 10 VMT than the VMT impact threshold of 17.4 and thus constitutes a ***significant impact.***

Table Trans-1 VMT per Employee Calculation

Vehicle Miles Traveled: Employee Commute Trips						
Land Use	**Mode Split (single-occupancy vehicle)**	**Mode Split (high-occupancy vehicle)**	**Average vehicle occupancy**	**Trip length (mi)**	**Person Trip Rate**	**VMT per employee**
Warehouse	80%	14%	2.0	17.9	1.84	27.8

Truck trips were initially estimated using rates for warehouses in the Institute of Transportation Engineers *Trip Generation Manual*, 10th ed., and projected that a 97,734 square foot warehouse would

[5] City of Los Angeles *VMT Calculator Documentation*, Los Angeles Department of Transportation and Los Angeles Department of City Planning, May 2020.

generate 51 truck trips per day. To reflect average conditions within the Azusa TAZ, truck trips were increased to 65 for VMT analysis. Table Trans-2 summarizes the truck VMT calculation.

Table Trans-2 Truck VMT calculation

Vehicle Miles Traveled: Truck Trips (Truck trips/day = 51)									
		Truck Trip Rate			Truck Trip Length			Truck Trips	VMT
Land Use	Warehouse Area (kSF)	Light	Medium	Heavy	Light	Medium	Heavy		
Warehouse	97.734	0.32	0.36	0.64	12.0	11.6	24.7	65	1,169

Although truck trips are not a part of the VMT threshold analysis, if the truck trips were counted as individual vehicle trips in the same manner as SOV and HOV vehicles, the average number of VMT per capita would be 17.98, above the 17.4 threshold, and constituting a ***significant impact***.

TRANS-3 Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

No Impact. The proposed project is limited to site development only and would re-develop two existing parcels that directly access Motor Avenue. The proposed driveways meet City standards for dimensions, distances from intersections, and off-street queuing, as noted in section Trans-1 above. The project is located in an industrial area, including substantial sand and gravel mining operations, where truck traffic is commonplace. No impacts with respect to design features are anticipated.

TRANS-4 Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed project would re-develop an existing industrial site, with two access driveways similar to the existing site configuration. Project construction would not require blocking streets or and would not otherwise impair public emergency routes. Moreover, before any building permits are issued, the final project site plan must be approved by the Los Angeles County Fire Department (contracted to the City) which evaluates the site and building plans for fire equipment access and fire code compliance. Impacts related to emergency access are accordingly anticipated to be less than significant.

5.5.6 Mitigation Discussion

In order to mitigate the VMT/Employee impacts of the warehouse land use to less than significant, employee VMT would need to be reduced by approximately 36 percent. In order to achieve this reduction, a range of travel demand management (TDM) measures and infrastructure options were considered for the Project. These included the following options:

- *Changes to infrastructure*: Measures that would provide pedestrian and bicycle facilities that connect the site to the local street network and other transportation networks;
- *Commute Trip Reduction*: Commuter incentives, transit subsidies, parking cash-out, commute marketing program, carpool/vanpool incentives;
- *Transit*: Providing transit passes to employees.

These TDM measures were tested individually and in combination with each other in the VMT modeling software. Most combinations of TDM measures would result in a reduction of VMT for the warehouse employees. However, as explained below, no feasible individual or combined mitigation options were found to be sufficient to substantially reduce or mitigate the VMT impact to less than significant.

In order to mitigate the project's VMT impact to below a level of significance, more employees would need to commute by alternative modes of transportation carpool. Present transit service likely does not provide adequate incentive for warehouse employees to use it, since the Route 185 service intervals along Irwindale Avenue are at least 30 minutes, and no other bus line serves the project area. Substantial public agency investment would be required to expand regional and local multimodal infrastructure, such as upgrades to the surrounding transit (e.g., adding routes along Motor Avenue, Gladstone Street), increasing the service frequency of the existing Foothill Transit route on Irwindale Avenue, instituting a free shuttle connecting employees to the train station or their residence, and adding connections to the regional bicycle network through a dedicated bike facility and transit stop within four hundred feet of the site (the existing Foothill Transit stop on Irwindale Avenue is approximately 550 feet from the southeast corner of the project site). Foothill Transit is not operated by the City. Generally, transit providers do not generally modify routes, intervals, and stops in response to individual developments, particularly one of this nature and limited scale. Although the City operates a Gold Line shuttle, the shuttle serves only Azusa residents, and would not be available to non-resident employees. Alternative transportation facilities or infrastructure, except for City-controlled bicycle facilities, are not within the City's jurisdiction or control, and to date, there is no City transportation-related impact fee.

There are bicycle routes that provide direct access to the site on Gladstone Avenue, Vincent Avenue and First Street, and the proposed project shows six bicycle spaces. However, more than six employees would need to cycle to work in order to reduce VMT below the threshold, simply because five alternative-transportation trips were accounted for in calculating project vehicle trips.

The City does not participate in a VMT credit "bank," in part because no VMT banks have been established with sufficient evidence that they collectively reduce impacts. The City would not have control over warehouse operations, and would thus have no ability to require an employer to provide a shuttle or to issue transit passes.

5.5.7 Significance After Mitigation

The project's transportation impact is considered ***significant and unavoidable*** as no combination of feasible mitigation measures reduces the impact below the City's threshold of significance.

5.5.8 Cumulative Impacts

As stated in Section 5.3, Greenhouse Gas Emissions, the proposed project will be constructed in an area where there are several new warehouse developments proposed or already approved (Table CP-1, Figure 20), with corresponding commute and client (freight trucks) vehicle trips that cannot reasonably be taken by transit or alternative means. The project's VMT would contribute to those trips and would not provide solutions for reducing project-related or cumulative VMT. Cumulative impacts are therefore also ***significant and unavoidable***.

6.0 Other CEQA Considerations

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6 Other CEQA Considerations

6.1 Long-term Implications of the Project

CEQA Guidelines §15126.2(a) directs that EIRs include a discussion of the short- and long-term effects of a project. These are discussed throughout Chapter 5 of this document. If the Project is approved and constructed, a variety of short- and long-term impacts would occur on a local level as discussed in both the Initial Study prepared for the project and in this Focused EIR. For example, surrounding uses may be temporarily impacted by vehicle emissions and dust during project grading and construction. Project construction would generate air pollutants and greenhouse gases.

Project operation would introduce new passenger vehicle and heavy truck VMT, contributing to the area's pollutant emissions. For the foreseeable future, most of these trips would not be taken with zero-emission vehicles. Project operation could also temporarily expose workers to hazardous soil vapors in the event that vapor intrusion prevention systems do not operate as specified.

These effects can be avoided or lessened substantially through mitigation cited in this EIR and through compliance with California regulations and the City of Azusa Municipal and Development Code (Municipal Code); refer to Section 5.0, Environmental Analysis, and Section 5.1.3, Effects Found Not To Be Significant.

6.2 Energy Impacts

CEQA Guidelines §15126.2(b) directs that EIRs mitigate a project's energy use if the analysis of the project's energy consumption would result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful consumption of energy resources. Part 5 of the Initial Study concludes that the proposed project would not likely waste energy or use energy inefficiently. "Wasteful" energy consumption implies that the energy actually used to construct and operate a project greatly exceeds that required to do so. It would be unreasonable, and economically inefficient, to use substantially greater amounts of energy resources than needed either to construct or to operate the proposed facility. Although the proposed warehouse's purpose is not specified, it is more likely than not that future users would not consume energy resources (electricity, natural gas, fuels, etc.) to the extent that a significant environmental impact would occur.

The proposed warehouse project would also not be expected to conflict with or obstruct renewable energy or energy efficiency plans, largely because project construction (and building mechanical operation, e.g., lighting, heating, cooling, plumbing and irrigation) is subject to the California Energy Commission's 2019 Building Energy Efficiency Standards for nonresidential buildings (Cal. Code Regs. tit. 24, Part 5) as well as the California Green Building Standards Code (CalGreen)(Cal. Code Regs., tit. 24, Part 11).

The 2019 Building Energy Efficiency Standards set forth mandatory requirements that apply to all buildings, as well as flexible performance standards (i.e., energy budgets) that are tailored to climate zones and permit design flexibility, and prescriptive "packages" that provide compliance checklists. Regulated systems include ventilation, space-conditioning systems, pipe insulation, air distribution system ducts and plenums, insulation, lighting, electrical power distribution, and lighting and sign controls. Developers are required to submit certificates of compliance, prepared by a licensed

professional engineer or architect, or a licensed contractor supervised by a licensed engineer to the local building department that identifies the energy features, performance specifications, materials, components, and manufactured devices required for compliance. The certificate must be submitted with the application for a building permit to the local building department or permitting agency.

CalGreen sets forth requirements for achieving energy efficiency in building construction and operation which must be met in order for a building permit to be issued. These requirements include designated parking spaces for clean-air and carpool vehicles, standards for electric-vehicle charging facilities, standards for indoor and outdoor water-consumption efficiency, and minimum numbers of short and long-term bicycle parking spaces.

With these requirements in place, in addition to economic incentives for avoiding excessive energy use in construction and operation, the project's impacts related to energy use are anticipated to be less than significant and do not require further mitigation.

6.3 Significant Irreversible Environmental Changes

CEQA Guidelines §15126.2(c) directs that EIRs include a discussion of the significant irreversible environmental effects that cannot be avoided if a project is implemented. Parts 5.2 (Air Quality), 5.3 (Greenhouse Gas Emissions) and 5.5 (Transportation and Circulation) conclude that the proposed warehouse's cumulative effects on air quality and greenhouse gas emissions cannot be feasibly mitigated to less than significant levels, and are thus significant and unavoidable. As described in the Initial Study and this EIR, the project's remaining impacts can be reduced to less-than-significant levels, and would not contribute to irreversible environmental changes.

6.4 Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines states that the assessment of growth-inducing impacts in the EIR must describe the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." As described in Part X, Land Use, in the Initial Study prepared for the project, the proposed warehouse development is consistent with the-City of Azusa General Plan's designation for planned growth within the area, which encourages developing new industrial uses, provided that the natural environment is protected. Because the development would replace an existing, albeit vacant, industrial use, the project would likely not change the site's demand for governmental services and infrastructure beyond that accommodated in the General Plan. Parts 14 (Public Services), 15 (Recreation), and 18 (Utilities and Service Systems) of the Initial Study indicate that that the projected number of employees at the warehouse would not be so great as to require new public infrastructure or facilities.

7.0 Alternatives to the Proposed Project

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7 Alternatives to the Proposed Project

CEQA Guidelines §15126.6 requires EIRs, with some exceptions for certain focused EIRs (see § 15175.9), to evaluate a "range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives…[t]here is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason" (CEQA Guidelines § 15126.6(a)). The alternatives selected should attempt to satisfy the project objectives while reducing environmental impacts, even if the alternatives are more costly (§ 15126(c)). Accordingly, this EIR suggests two alternatives in addition to the "no project" alternative: a reduced-size alternative and a business park alternative. Other alternative projects described in Fehr & Peers, p. 4, that would reduce VMT impacts, would not likely be commercially viable for this site (local-serving retail uses under 50,000 square feet, local-serving assembly uses, community institutions), or would not be suitable for the site (affordable housing projects, hospitals, assisted-living facilities) because of the property's zoning and the use restrictions described in Section 5.4 above. Moreover, such alternatives would not satisfy the project's primary objective, constructing a large storage warehouse.

7.1 Summary of Project Objectives

1. Clearing the project site of existing deteriorating structures, paving, and landscaping;
2. Merging parcel numbers AIN 8615-002-019 and 8615-002-020 to create a single parcel;
3. Importing approximately 4,620 cubic yards of fill material to create a building pad at a site elevation of 504 feet above mean sea level;
4. Installing necessary drainage devices to convey stormwater into the City storm drain system;
5. Installing a vapor mitigation system to remove PCE and TCE vapors from the site soils;
6. Conducting additional soil/site remediation to reduce soil contaminants to below regulatory thresholds;
7. Re-developing the project site with a 97,148 square-foot, 39-feet tall, warehouse structure encompassing 3,403 square feet of office space, with sufficient parking, access driveways, and landscaping;
8. Delivering a turn-key storage warehouse suitable for 24/7 operations to interested buyers, in line with City economic-development goals; and
9. Providing a source of employment for skilled construction and warehouse workers.

7.2 Summary of Significant Impacts

The proposed warehouse project would cause significant and unavoidable impacts with respect to transportation and circulation (VMT), air quality, and GHG emissions. Transportation impacts arise from the project's VMT/employee, which exceed the City threshold and cannot be feasibly mitigated to less-than-significant levels. Air quality and GHG impacts arise from the ozone-precursor emissions associated with the passenger car and freight truck VMT. Impacts related to hazards, hazardous

materials, biological and cultural resources, including tribal resources, can be mitigated to less than significant levels.

7.3 "No Project" Alternatives

1. **No Project – Property Remains Vacant.** This alternative would result in no immediate changes to the subject property. If the property remained vacant and the buildings unoccupied, no new impacts would occur. Without redevelopment of the site, the on-site potential health hazards would remain (asbestos-containing building materials, lead-based paint, soil-vapor emissions in building interior spaces).
2. **No Project – Existing Structures Re-used.** This alternative would re-use the existing buildings according to the permissive uses outlined in the City Development Code without any discretionary entitlements required, and thus with no project-specific mitigation measures applied. Vapor-intrusion mitigation would not be required unless a discretionary entitlement was sought. Enforcement of DTSC commercial building standards for vapor intrusion would likely be enforced only if an individual filed a complaint, after worker exposure. Workers could be exposed to lead paint residues and asbestos, as there is strong potential for these materials to be present on the site's structures. Impacts to tenants could be significant. Projected VMT/employee would likely be similar to that of the proposed project, because without improved transit infrastructure, the TAZ average trip length of 17.9 miles/person for home-based work attractions would not change. As with the proposed project, added vehicle emissions would not improve the region's nonattainment status for PM and ozone precursors, so impacts to regional air quality would be similar to the proposed project's.
3. **No Project – Demolition and Development of Permitted Use.** This alternative would involve building demolition in order to construct buildings for uses permitted in the zone. For example, a warehouse of the same size as the proposed project, without 24/7 operations, could be constructed on-site by right of zone. As in the alternative 7.3(2) above, an unknown number of worker commute trips would likely resume, generating VMT and exhaust emissions.

Accordingly, only if the property remained vacant would there be no increase in emissions and VMT, and no associated impacts. The project objectives, including re-developing the site with a code-compliant warehouse structure intended for non-refrigerated storage and 24/7 operations, would not be accomplished.

7.4 Reduced Size Alternative

This alternative would construct a warehouse with less capacity than the one proposed. Air quality and greenhouse gas emission impacts would be lessened proportionately, but because particulate matter and ozone-precursor emissions would still be generated in a region that is in non-attainment for both pollutants, any increase must still be considered cumulatively significant and unavoidable. A smaller project would require fewer employees, and potentially fewer vehicle trips. Total vehicle miles traveled (VMT) might be reduced, but because the VMT impact *threshold* (17.4) is per-person, and because vehicle trips would most likely still occur in single-passenger vehicles, no meaningful reduction in

VMT/employee would occur. Impacts associated with hazards and hazardous materials would not change, and would be mitigated to less than significant levels by the same mitigation measures as have been drafted for the proposed project.

7.5 Business Park Alternative

This alternative would construct a small "business park" of individual building units, used for light manufacturing, R&D, offices, or non-medical professional services permitted in the DW zone. Operational air quality and greenhouse gas emission impacts would potentially be greater because such uses typically employ more workers who would in turn generate more vehicle trips. As with the proposed project, particulate matter and ozone-precursor emissions would still be generated in a region that is in non-attainment for both pollutants, and result in significant and unavoidable cumulative impacts. Overall vehicle miles traveled (VMT) would likely increase with the greater worker numbers, and VMT/employee would likely be similar to that of the proposed project, in the absence of improvements in local transit availability and frequency. Impacts associated with hazards and hazardous materials would not change, and would be mitigated to less than significant levels by the same mitigation measures as have been drafted for the proposed project.

7.6 Environmentally Superior Alternative

The proposed project would remain the environmentally superior alternative, in part because it would re-develop a property in a manner that would remove and properly dispose of structural materials potentially containing lead paint residue and asbestos, and would manage harmful soil-borne vapors by installing a vapor-intrusion barrier, protecting future workers. Moreover, the proposed project is consistent with the industrial uses anticipated for the property in the General Plan. Any development of the site would result in VMT impacts, simply because VMT-reducing projects, such as mixed-use housing/commercial projects or live-work units, are not permitted in the DW zone, and in any case could not be constructed on the site until soil-borne vapor concentrations are reduced below DTSC standards for residential uses. By-right development would generate PM, ozone precursors and GHG emissions and would not be required to mitigate them beyond compliance with Title 24 and SCAQMD fugitive-dust requirements.

8.0 Organizations and Persons Consulted

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8 Organizations and Persons Consulted

ASTM International

California Air Resources Board

California Building Standards Commission

California Department of Fish and Wildlife

California Department of Toxic Substances Control

California Department of Transportation

California Energy Commission

California Environmental Protection Agency

California Native American Heritage Commission

California Office of Emergency Services

City of Azusa

Foothill Transit

Los Angeles County Fire Department

Los Angeles County Office of Emergency Management

Los Angeles Department of Public Works

Los Angeles Metro

South Coast Air Quality Management District

Southern California Association of Governments

U.S. Department of Homeland Security, Federal Emergency Management Agency

U.S. Environmental Protection Agency

9.0 Appendices

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9 Appendices (under separate cover and available for download)

A. Notice of Preparation

B. Initial Study and Comment Letters

C. Phase I Environmental Site Assessment (Salem Engineering)

D. Trip Generation Memorandum (Willdan)

E. VMT Analysis (Fehr and Peers)

F. CalEEMod Tables (Willdan)