DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION
SCH # 2021020022

Project Name:	City of La Cañada Flintridge General Plan Housing Element Update (6th Cycle) and Safety Element Update Project
Project Location:	Citywide Project that encompasses the entirety of the City of La Cañada Flintridge
Project Applicant:	Community Development Department City of La Cañada Flintridge One Civic Center Drive La Cañada Flintridge, CA 91011 Contact: Susan Koleda, Director of Community Development, skoleda@lcf.ca.gov
Lead Agency:	Community Development Department City of La Cañada Flintridge One Civic Center Drive La Cañada Flintridge, CA 91011 Contact: Susan Koleda, Director of Community Development, skoleda@lcf.ca.gov
Public Review Period:	October 6, 2021 to November 5, 2021

This Draft Initial Study/Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). It is available for a 30-day public review period as shown above.

Comments regarding this document should focus on the sufficiency of the document in identifying and analyzing the potential impacts on the environment that may result from the proposed project, and the ways in which any potentially significant effects are avoided or mitigated. **All comments must be made in writing** and addressed to Ms. Susan Koleda, Community Development Director, City of La Cañada Flintridge, One Civic Center Drive, La Cañada Flintridge, California 91011. Comments may be sent by e-mail to skoleda@lcf.ca.gov. Comments must be received in the Community Development Department office no later than 5:00 P.M. on the last day of the public review period noted above.

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Chapter 1

INTRODUCTION

CEQA Overview and Process

The City of La Cañada Flintridge (City or LCF) Community Development Department has prepared this Draft Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate the potential environmental effects associated with the proposed City of LCF General Plan Housing Element and Safety Element Update Project (project or proposed project). As part of the approval process, the proposed project is required to undergo an environmental review pursuant to CEQA. One of the main objectives of CEQA is to disclose to the public and decision makers the potential environmental effects of proposed projects.

CEQA requires that the lead agency prepare an Initial Study (IS) to determine whether an Environmental Impact Report (EIR), Negative Declaration (ND), or a Mitigated Negative Declaration (MND) is needed. The City of LCF, Community Development Department is the lead agency for the proposed project under CEQA, and per State CEQA Guidelines Section 15070 has determined that an MND would be prepared. A description of the proposed project is found in Chapter 2 of this document.

Once it has been determined that an activity is a project subject to CEQA, it is then determined whether the project is exempt from CEQA. CEQA contains a statutory exemption associated with the Regional Housing Needs *Allocation* (RHNA):

> *CEQA Guidelines §15283: Housing Needs Allocation. CEQA does not apply to regional housing needs determinations made by the Department of Housing and Community Development, a council of governments, or a city or county pursuant to Section 65584 of the Government Code.*

Therefore, while the Southern California Association of Governments (SCAG) was not required to prepare a CEQA compliance document for the City's RHNA, this CEQA statutory exemption does not apply to the preparation of an updated General Plan Housing Element to reflect the updated 6th Cycle RHNA (2021-2029). CEQA compliance is also required for the Safety Element Update component of the project as well.

Public Outreach and Involvement

Public outreach for the CEQA document, beyond the required CEQA public notices, will continue to be integrated with the public outreach efforts on the Housing Element and Safety Element updates. The City has also conducted outreach to local Tribes as part of the CEQA process for AB 52 and SB 18 compliance.

To initiate the CEQA process, the City issued a Notice of Preparation (NOP) of an Initial Study (IS) on February 1, 2021. The NOP was published by the Governor's Office of Planning and Research/State Clearinghouse for a period of 30 days. The City also published the NOP on the City website, sent it via eblast and mailed hard copies to more than 55 stakeholders, including four Native American Tribes, on the NOP Mailing List. A copy of the NOP and NOP Mailing List are on file with the City and are available for review on the City's website at www.Cityoflcf.org and at City Hall Monday through Thursday from 7AM to 5PM and Friday 8AM to 5PM.

In response to the NOP, the City received comment letters from the following public agencies, entities and stakeholders:

- California Department of Fish and Wildlife (CDFW)
- California Department of Transportation, District 7 (Caltrans)

- County of Los Angeles Fire Department (LACFD)
- Gabrieleno Band of Mission Indians - Kizh Nation
- Los Angeles County Sanitation District
- Native American Heritage Commission (NAHC)
- Sothern California Association of Governments (SCAG)
- South Coast Air Quality Management District (SCAQMD)

Copies of the NOP comment letters are on file with the City and are available for public review on the City's website at www.cityoflcf.org and at City Hall Monday through Thursday 7AM to 5PM and Friday 8AM to 5PM. All NOP comment letters have been reviewed by the City and were used to inform the scope and content of the CEQA analysis that follows.

The City has held two public workshops to date to provide information on the proposed project (Housing Element and Safety Element Updates) and receive public comments. The public workshops were hosted by the La Cañada Flintridge Planning Commission and held virtually on Thursday, March 11, 2021 and Thursday, June 10, 2021.

After the Draft Housing and Safety Element updates have been through the public review process, including review by the State of California, Department of Housing and Community Development (HCD), they will be scheduled for formal consideration at one or more public hearings. It is currently anticipated that the first public hearing will be held by the Planning Commission in 2021 and the second public hearing will be held by the City Council in Fall 2021 or Winter 2021/2022. Due to the COVID-19 pandemic, public engagement was held virtually.

As required by State law, the Housing Element must be adopted by the La Cañada Flintridge City Council and submitted to the State no later than February 12, 2022 which includes the allowable 120-day grace period.

Authority

The preparation of this IS/MND is governed by two principal sets of documents: CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). Specifically, the preparation of an IS and an MND is guided by the State CEQA Guidelines; Section 15063 describes the requirements for an IS, and Sections 15070–15073 describes the process and requirements for the preparation of an MND. Where appropriate and supportive to an understanding of the issues, reference will be made either to the CEQA statutes or State CEQA Guidelines. This IS/MND contains all of the contents required by CEQA, which includes a project description, a description of the environmental setting, potential environmental impacts, mitigation measures for any potentially significant effects, consistency with plans and policies, and names of preparers.

Scope

This IS/MND evaluates the proposed project's potential effects on the following resources / topics:

- aesthetics
- agriculture and forest resources
- air quality
- biological resources
- cultural resources
- energy
- geology and soils
- greenhouse gas emissions
- hazards and hazardous materials
- hydrology and water quality
- land use planning
- mineral resources
- noise
- population and housing
- public services
- recreation
- transportation
- tribal cultural resources
- utilities and service systems
- wildfire
- mandatory findings of significance

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Chapter 2

ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

Proposed Project Description

The proposed project evaluated in this CEQA document is the City of La Cañada Flintridge (City) General Plan Housing Element Update (HEU) and Safety Element Update (SEU) project.

The City's existing General Plan was most recently updated in 2013, is the official policy document for future development and has a land use planning horizon year of 2030. The General Plan consists of eight elements: 1) Land Use; 2) Open Space and Recreation; 3) Conservation; 4) Safety; 5) Circulation; 6) Noise; 7) Air Quality; and 8) Housing. All elements carry equal weight and are designed to be consistent with each other.

The General Plan guides the pattern of land development, including residential, commercial, mixed use and all other land use types and includes policies and programs intended to shape community development over the long term through buildout. The General Plan describes how the City will grow and/or change over time, and is the mechanism by which community character is intended to be preserved and enhanced.

The City is located in northern Los Angeles County (see Figure 1-1- Regional Location Map in Attachment A). Specifically, the City is adjacent to the cities of Pasadena, Glendale, unincorporated portions of Los Angeles County and the Angeles National Forest (see Figure 1-2 – Vicinity Map in Attachment A). Existing land uses in the City are shown in Figure 1-3, Attachment A.

All local governments in California are required by State Housing law to adequately plan to meet their share of the State's overall housing need. The State of California, Department of Housing and Community Development (HCD) is responsible for administering Housing Element Law and for identifying the State's overall housing need.

The Housing Element sets goals, objectives, policies, and programs that are implemented after the plan is adopted. When a new housing program, project, or idea is considered, the Housing Element provides guidance for local decision-makers to evaluate the proposal.

The revised Housing Element must be adopted by the La Cañada Flintridge City Council and submitted to HCD no later than February 12, 2022 including the 120-day grace period available to the City.

State legislation requires that the City update the Safety Element at the same time as the Housing Element. The updated Safety Element may be adopted concurrently with the Housing Element or at a separate hearing. The Housing Element must remain consistent with the other elements of the General Plan. This may require amendments to certain elements, most often the Land Use Element.

Housing Element Update: Summary Overview and Key Elements

The Housing Element is Chapter 9 of the City's General Plan. The City of La Cañada Flintridge has prepared a draft 6th Cycle Housing Element, which will cover the eight-year planning period beginning October 2021 through October 2029. The Draft Housing Element is available for review on the City's website at www.cityoflcf.org/housing-element-update/ and at City Hall during public hours of Monday through Thursday from 7AM to 5PM and Friday 8AM to 5PM.

The City is primarily built out. However, as is required by state Housing Element law, the City has identified sites that could accommodate La Cañada Flintridge's future housing needs in accordance with the 6th Cycle RHNA. Appendix A (Sites Inventory) provides a list of the vacant and underutilized properties in the City. With very little vacant land left in La Cañada Flintridge, the City's strategy is to identify remaining vacant properties and underutilized sites, primarily focusing along the Foothill Boulevard corridor, with one site located on Verdugo Boulevard.

The Housing Element Update (HEU) is intended to assist the City in meeting its share of the regional housing needs, to implement the City's General Plan Housing Element relative to the provision of housing units for all economic sectors of its population, and to plan for affordable housing in both rental and for-sale housing consistent with provisions of the California Government Code.

It is important to note that compliance with the assigned RHNA is essentially non-discretionary for the local jurisdiction. Further, the RHNA is an eight year planning goal not a housing production requirement. The HEU does not grant any development entitlements or authorize construction development. No physical development, construction or other ground disturbance is proposed at this time. Therefore, no direct physical impacts to the environment would occur from HEU adoption.

To satisfy and meet the RHNA planning goal assigned to the City by the Southern California Association of Governments (SCAG), the City completed a Citywide parcel-specific land inventory that includes sites capable of accommodating the 6th Cycle RHNA allocation. These sites are shown in Figures C-1 through C-6 of Appendix C of the HEU. In total, the housing opportunity sites inventory includes 96 candidate housing sites, 11 of which are new to the 6th Cycle RHNA 2021-2019 HEU.

Development of 85 of the 96 sites was evaluated under the 5th Cycle HEU CEQA compliance document as well as in the La Canada Flintridge General Plan Update Program EIR (SCH No. 2009061012) and the Addendum to the PEIR adopted in 2014. The HEU does not grant any land use entitlements or authorize development in areas not already designated for residential development including development of low income housing on religious institution property as allowed by current State law.

Background

Since 1969, California has required that all local governments adequately plan to meet the housing needs of everyone in the community. The Housing Element is a State-mandated policy document within the General Plan that guides the implementation of various programs to meet future housing needs for residents of all income levels as determined through the Regional Housing Needs Assessment (RHNA).

Every eight years, "housing need"—both the total number of units and the distribution of those units by affordability levels—is determined by HCD for the entire State. HCD then distributes this housing needs assessment to each regional planning body in California; this housing needs assessment is the amount of housing that must be planned for by each region. Periodic updates are required as housing is essential to supporting economic prosperity and quality of life throughout the State. The update also helps to ensure that jurisdictions are responding to residents' changing needs.

State Housing Element law requires "An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs." The law requires:

- An analysis of population and employment trends;
- An analysis of household characteristics;
- An inventory of suitable land for residential development;

- An identification of a zone or zones where emergency shelters are permitted by right;
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing;
- An analysis of special housing needs;
- An analysis of opportunities for energy conservation;
- An analysis of publicly assisted housing developments that may convert to non-assisted housing developments; and
- An assessment of fair housing practices in order to develop policies and programs designed to affirmatively further fair housing.

The purpose of these requirements is to develop an understanding of the existing and projected housing needs within the community and to set forth policies and schedules, which promote preservation, improvement and development of diverse types and costs of housing throughout the City of La Cañada Flintridge.

The 5th Cycle Housing Element update covered the period from 2013 through 2021 and provided a foundation for the current 6th Cycle update. Please refer to the City's Draft 6th Cycle Housing Element for more detail on the City's goals, policies, and programs available at the link below: (https://cityoflcf.org/housing-element-update/)

It should be noted that CEQA compliance for various HEU components has already been completed, or will be completed, as follows:

- 5th Cycle Projects (85 of the 96 sites on the site inventory have been carried forward from the last HEU and were subject to previous environmental review by the City)
- Pipeline Projects (three projects are in the active entitlement process and are subject to their own site-specific, project-level CEQA review/compliance efforts)
- Entitled Projects (i.e., approved by the City) but building permits have not yet been issued)
- Other CEQA Exempt projects (ADU's, infill, affordable housing projects and single family homes)

6th Cycle HEU for the 2021-2029 Planning Period

To comply with State law, each jurisdiction's Housing Element is updated to ensure its policies and programs can accommodate its share of the number of housing units identified by the State as being required. For the 6th Cycle Housing Element update, the City's share of the RHNA is 612 units, divided among a range of income or affordability levels (based on Area Median Income, or AMI), as shown in Table 2-1.

TABLE 2-1 6TH CYCLE RHNA FOR THE CITY OF LA CAÑADA FLINTRIDGE

Income Category/Affordability Level*	Number of Units	Percent of Total Units
Very Low Income (0-50% of AMI)	252	41%
Low Income (50-80% of AMI)	135	22%
Moderate Income (80-120% of AMI)	139	23%
Above Moderate Income (More than 120% of AMI)	86	14%
TOTAL UNITS	**612**	**100%**

**Income/affordability categories are grouped into the four categories shown in the table above; average median income (AMI) is the average household income for each Metropolitan Statistical Area. The AMI for Los Angeles County is currently $77,300.*

Key components of the Housing Element Update include the following:

- An updated demographic profile and analysis of population growth and trends;
- Identification and analysis of existing and projected housing needs for all economic segments of the community;
- Identification of adequate sites currently zoned, or can be rezoned, to allow housing and available within the 8-year housing cycle to meet the city's RHNA at all income levels as prescribed by SCAG;
- Provision for additional potential housing opportunities to provide a 15-30% surplus or buffer above and beyond the RHNA for very low, low and moderate incomes in the event that future residential projects do not get built out at the allowable maximum densities assumed in the HEU to help the City comply with SB 166 (No Net Loss) and maintain an inventory of residential sites to accommodate the City's total RHNA throughout the 6th Cycle planning period;
- An evaluation of local constraints and/or barriers to housing development as well as opportunities to develop housing; and
- Housing goals, policies, objectives and programs to preserve, improve and develop housing within the City.

Through the HEU process, the City is required to demonstrate that it has the land use plans, policies and programs to accommodate its assigned RHNA plus an additional 15-30% buffer or surplus units. After accounting for development credits, anticipated ADUs, and realistic capacity of vacant and underutilized sites, the City has identified surplus capacity of 211 units in the lower income category (very low and low combined), which represents an average of 54 percent for the combined lower income category and 84 surplus units (representing 60 percent) in the moderate income units as shown in Table 2-2.

TABLE 2-2 COMPLETE SUMMARY OF 6TH CYCLE RHNA INCLUDING SURPLUS

Income	RHNA	Entitled	Pending/ Pipeline	Sites	ADUs	Total	Surplus	% Surplus
Very Low	252	---	---	341	41	348	96	38%
Low	135	3	23	184	40	250	115	85%
Moderate	139	---	1	219	3	223	84	60%
Above Moderate	86	2	129	74	36	241	155	180%
Total	**612**	**5**	**30**	**153**	**120**	**1,062**	**450**	**74%**

New in this HEU are accessory dwelling units (ADU). An ADU is an attached or detached residential unit that provides complete independent living facilities for one or more people. A Junior Accessory Dwelling Unit (JADU) is an ADU contained entirely within a single-family residence. Approximately 20 ADUs were approved in the City between 2018 and 2020—five in 2018, two in 2019, and 13 in 2020. As of the end of August 2021, 17 ADUs have been approved; if that trend continues, the City will be on track to approve a total of approximately 25 ADUs by the end of 2021.

In May 2020, the City adopted new regulations for ADUs to comply with state legislation, including AB 68, AB 881, AB 587, AB 671, and SB 13. This legislation promotes the construction of new ADUs and JADUs and limits the ways cities can regulate their design. Under current state law the City may adopt regulations governing the design of ADUs, but no lot coverage, floor area ratio, open space, or minimum lot size can preclude the construction of a "statewide exemption ADU," which is an ADU with an area up to 800 square feet, height up to 16 feet, and 4-foot side and rear yard setbacks.

The City is not required to construct the housing identified in the HEU and RHNA. Rather, the actual development of housing is anticipated to be constructed by land developers and individual property owners. However, the City is required to demonstrate through the HEU that it has the policies and programs in place and the sites available to accommodate housing to meet the needs of all income levels of the assigned (allocated) RHNA over the eight-year planning period.

Identification of potential sites and related site housing capacity does not guarantee that construction will occur on that site as the City is not required to construct the housing. If there are insufficient sites and capacity to meet the RHNA allocation, the Housing Element is required to identify a rezoning program to accommodate the required capacity.

The HEU may also potentially identify necessary future implementation actions such as revisions to the Zoning Code and/or the Downtown Village Specific Plan (DVSP), to accommodate the RHNA. Other revisions may be necessary to bring the Zoning Code into compliance or maintain compliance with other State-mandated housing laws, such as the accessory dwelling unit ordinance, emergency shelter ordinance, transitional and supportive housing ordinances and low barrier navigation center ordinances, density bonus ordinance, and other ordinances as appropriate.

The 6th cycle RHNA covers a planning period that is approximately 8.3 years, from June 30, 2021, through October 15, 2029. Housing units built, under construction, or approved June 30, 2021 onward, can be credited towards meeting the City's RHNA. Units in various stages pending City approval (i.e., pipeline projects) also can be credited toward the RHNA. These units can be subtracted from the City's share of regional housing needs. The City must demonstrate in this Housing Element its ability to meet the remaining housing needs, through the provision of sites, after subtracting credited units. As of July 1, 2021, the City entitled a total of five housing units, including ADUs/JADUs and single-family homes. See HEU Table HE-40 for unit type and affordability category. As of July 1, 2021, a total of 64 units, including condominiums, ADUs/JADUs and single-family homes, were at various stages of City review and approval, but building permits have not yet been issued by the City.

After accounting for units approved and those pending approval, a remaining need of 456 units exists. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029.

The City desires to retain and support its commercial and service establishments. Mixed use land use designations and zones are proposed to be retained in an effort to encourage development of new

residential uses and maintenance of the community's commercial core. The RHNA also estimates the construction of additional ADU's/JADUs in the coming years consistent with recent development trends.

Safety Element Update: Summary Overview and Key Elements

California Senate Bill 1241 (SB 1241) was passed by the California legislature in 2012, which required jurisdictions to update their Safety Elements upon the next revision of the Housing Element, on or after January 1, 2014. Subsequently, Government Code § 65302, subd(g)(3.2) was changed to address fire hazard planning.

The Safety Element is Chapter 5 of the City's General Plan and was last updated in 2013. The 2021 updated Draft Safety Element is available for review on the City's website at www.cityoflcf.org and at City Hall Monday through Thursday from 7AM to 5PM and Friday 8AM to 5PM.

The Safety Element has been updated concurrently with the Housing Element update and has incorporated housing-related discussions and policies on flood hazards, wildfire, emergency preparedness, and climate change. The Safety Element outlines hazards related to development in the City.

The entire City of La Cañada Flintridge is located in the Very High Fire Hazard Severity Zone (VHFHSZ), as defined by CAL FIRE. Twelve neighborhoods in the City, representing 838 residences, approximately 10% of the City's housing stock, have a single point of access and egress which can result in difficulty evacuating neighborhoods in the event of a wildfire. For these neighborhoods, a new Safety Element policy is proposed to prohibit the development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) and prohibit the conversion of existing spaces to ADUs and JADUs to avoid increasing population density in these hazard areas.

The safety of a community is a key component of its quality of life. Protection of its citizens, visitors, structures, infrastructure, and public facilities from natural and human-made hazards is an important function of local government. The purpose of the Safety Element of the General Plan is to identify natural and human-made hazards in or near the City that pose potential danger to the safety and welfare of the community, and to establish goals, objectives, and policies to reduce risk to life and property from these hazards.

The Safety Element addresses seismic and other geologic hazards, flooding and other hydrologic hazards, fires and fire-related hazards, hazardous material and sites, crime, and emergency preparedness. Hazardous incidents most likely to occur in La Cañada Flintridge include earthquakes, landslides, wildfire, hazardous material spills on the Interstate (I) 210 Freeway, and storm-related incidents such as debris and mud flows. Summaries of pertinent technical information regarding each of these topics are provided in the Safety Element for general information and to provide a context for the goals, objectives, and policies.

The City has updated its General Plan Safety Element in conformance with the requirements and guidelines issued by the State Office of Planning and Research (OPR) General Plan Guidelines (2017), OPR's Fire Hazard Planning guidance, and the City's very high fire hazard severity zone map (VHFZSZ).

The Safety Element incorporates by reference the City's 2019 adopted Local Hazard Mitigation Plan (LHMP) as well as the City's 2016 Climate Action Plan. A new State requirement requires an analysis of climate change adaptation and resilience, including a vulnerability assessment and measures to address vulnerabilities. These new analyses have been incorporated in the updated 2021 General Plan Safety Element.

The City consulted with the Los Angeles County Fire Department (LACFD) and the California Department of Forestry and Fire Protection (CAL FIRE) during the development of the Safety Element update on necessary

updates to address fire and wildfire safety issues in the City. The City also consulted with the Foothill Municipal Water District and the Southern California Gas Company during preparation of the updated Draft Safety Element.

Existing Setting

The City of La Cañada Flintridge incorporated in 1976 and is approximately 8.6 square miles in area. It is located approximately 13 miles northeast of downtown Los Angeles and 6 miles northeast of Burbank in Los Angeles County, as shown in Figure 1-1 (see Attachment A). The City is bordered by Pasadena to the east, Glendale to the south, the Angeles National Forest to the north, and unincorporated county areas of La Crescenta and Montrose to the west. It is situated in the Crescenta Valley along the Interstate (I) 210 Freeway corridor between the San Gabriel Mountains to the north and the San Raphael Hills to the south. Figure 1-2 shows its location in the local setting and surrounding jurisdictions for context.

According to the City's 2030 General Plan, Vision 2030:

> "*La Cañada Flintridge is a desirable community that has retained its quiet, safe, small-town feeling, and semi-rural, predominantly single-family character amid the beauty of its natural open spaces, trails, trees, parks, wildlife, and stunning mountain views. Neighborhoods and homes are well maintained, with landscaping and diverse housing styles that are in scale with their surroundings. La Cañada Flintridge remains an equestrian-friendly community. The downtown is vibrant, attractive, and modern, and caters to the City's residents with quality shopping and dining establishments and local-serving businesses within a walkable, pedestrian scale village atmosphere. New housing opportunities for senior citizens and families are provided within mixed-use developments that are close to businesses, health care services, community and recreational facilities, and transit. Friendly, caring, and involved citizens of all ages share a commitment to their community and to each other. Premier schools continue to achieve the highest academic standards in up-to-date facilities, and opportunities exist for teens and pre-teens to be active and involved. The City is run efficiently and maintains positive, effective relationships with neighboring cities and regional and state agencies to address and resolve regional issues cooperatively, such as air quality, traffic, and noise."*

No Sphere of Influence was identified or established by the Local Agency Formation Commission (LAFCO) to extend the boundaries of the City due to its proximity to adjacent built out urban areas and federally designated open space.

Today the community is largely built-out. While housing stock is relatively stable, the city has experienced changes in its population characteristics, which impacts housing needs. For example, while the city's population grew by only 1.1 percent between 2010 and 2020, it has seen an increase in its Asian population, growing from 26 percent to 31 percent between 2010 and 2019.

The age distribution in the community has also shifted. Between 2010 and 2019, the median age in the community decreased slightly from 45.9 to 45.1 years. In 2010 seniors 55 years and over accounted for 31 percent of the population, with this proportion increasing to 35 percent between 2010 and 2019 as persons in their 50s and early 60s aged in place. The city currently lacks housing options tailored for seniors.

Today, the City is largely built-out and the City's adopted policy is to retain the community's natural hillsides and semi-rural character. In addition, the presence of natural resource and infrastructure constraints (e.g., steep slopes, hillside topography, wildfire hazards, lack of public sanitary sewers or acceptable percolation rates for septic systems on the few remaining vacant parcels in the city precludes extensive development).

The population of the city has been relatively stable/consistent since 1980 with only minor fluctuations reflecting the built out nature of the City.

Table 2-3 shows population growth in La Cañada Flintridge and other cities in the region over the last decade. As shown in the table, the city's population increased by only 15 persons between 2010 and 2020, whereas other nearby cities experienced modest growth.

TABLE 2-3 REGIONAL AND LOCAL POPULATION GROWTH

City	2010	2020	Change (2010–2020)	
Los Angeles	3,792,621	4,010,684	218,063	5.7%
Glendale	191,719	205,331	13,612	7.1%
Pasadena	137,122	144,842	7,720	5.6%
La Cañada Flintridge	20,246	20,261	15	0%

Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.

The average household size in La Cañada Flintridge is larger than the average household in Los Angeles County and most surrounding communities at 3.15 average persons per household according to the *American Community Survey 2014-2019* estimates.

Existing Land Uses in the City

The La Cañada Flintridge General Plan and Zoning Code provide for a range of land use designations/zones in the city that can accommodate residential units. The City's Downtown Village Specific Plan applies to the downtown core of the city and provides development guidance and standards for that portion of La Cañada Flintridge.

Existing General Plan land uses in the City are shown in Figure 1-3 in Attachment A. Land uses within La Cañada Flintridge are predominantly residential in nature and predominantly single-family residential. The residential areas include neighborhoods on lots that are generally 0.25 acre or more to larger lots on winding, tree-lined streets. The City's neighborhoods are generally well maintained and heavily landscaped.

According to HEU (see Table HE-23), the composition of the city's housing stock has remained relatively consistent over the over the past decade with single-family detached homes comprising the majority of the housing stock in La Cañada Flintridge (92 percent). The remaining share of homes in La Cañada Flintridge consists of mobile homes, multi-family units, and single-family attached units, which together accounted for approximately 8 percent of residential units in the City.

Local-serving commercial land uses are located primarily along Foothill Boulevard, which retains a village character within the Downtown Village Specific Plan (DVSP) area. The City's commitment to preservation and protection of open space, its undeveloped hillsides, and its trail system has resulted in nearly 20 percent of its land being devoted to public and private open space uses. NASA's Jet Propulsion Laboratory (JPL) is located within the City limits. However, the City does not have any manufacturing or industrial planned land uses.

The City recognizes that the community's hillside areas provide an important aesthetic, natural resource and recreational resource to the community. To preserve habitat areas and natural characteristics of the city's hillside areas, additional development constraints apply to hillside properties based on topographic and viewshed concerns.

However, some of the hillside areas of La Cañada Flintridge, which were developed into the steep terrain, resulted in long, winding roads that terminate on the sides and tops of ridges leading to residential land uses. This existing condition creates a challenge for emergency vehicles which may, at times, have difficulty accessing homes due to inadequate roadway widths, while vehicles parked on-street within the right-of-way further narrow the drive lanes. There are 12 neighborhoods in La Cañada Flintridge, totaling 838 houses, with a single point of access and egress, and several of these areas are in the hillsides of the city. See HEU Figure HE-5 for the locations of these areas.

Depending on the location and slope of the lot, the General Plan and the Zoning Code establish standards to provide limitations on residential densities and the maximum size of dwelling units. Due to geological and construction constraints and safety issues, the City permits only low-intensity developments and ADUs as required by state law in the hillside areas. However, the City's updated draft Safety Element proposes to prohibit ADU's and JADU's in areas with a single point of access and egress, to avoid putting additional people/population at risk from wildfire related safety hazards.

The City is currently preparing a comprehensive update to the Zoning Code, which is anticipated to result in changes to certain land uses, development standards, and permit processes to address constraints and inconsistencies associated with the 6th Cycle HEU and Safety Element Update. It is anticipated that the updated Zoning Code will be adopted by the City following the adoption of the 6th Cycle Housing Element in 2021/2022.

ADDITIONAL APPROVALS

The California HCD has to review and certify the City's Housing Element and the California Department of Forestry and Fire Protection (CalFire) is required to review the City's updated Draft General Plan Safety Element.

TRIBAL CONSULTATION

California Native American tribes traditionally and culturally affiliated with lands in the City that have requested consultation pursuant to CEQA Statute § 21080.3.1 have been contacted by the City as part of the CEQA NOP process. City staff conducted notification and consultation with these Tribes per the requirements of CEQA Statute § 21080.3.2.

Although no cultural or tribal cultural concerns were raised during the consultation process due to the nature of the project as it does not involve any ground disturbing activities, standard resource protection measures are included in Attachment 2 for Cultural Resources and Tribal Cultural Resources are applicable to future land development projects. These standard measures and conditions are included herein consistent with the Mitigation Measures contained in the City's General Plan EIR and/or the City's Draft (In-Progress) Local CEQA Guidelines and are intended to support the consultation process.

Chapter 3

INITIAL STUDY ENVIRONMENTAL CHECKLIST

Project Information

PROJECT TITLE: City of La Cañada Flintridge General Plan Housing Element Update and Safety Element Update Project

LEAD AGENCY NAME AND ADDRESS:
Community Development Department
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA. 91011

CONTACT PERSON:
Susan Koleda, Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA. 91011
Phone: (818) 790-8881
Email: skoleda@lcf.ca.gov

PROJECT LOCATION: This is a Citywide project

PROJECT APPLICANT:
Community Development Department
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA. 91011

GENERAL PLAN DESIGNATION: Various as this is a Citywide project

ZONING DESIGNATION: Various as this is a Citywide project

DESCRIPTION OF PROJECT: See Chapter 2, Proposed Project Description.

SURROUNDING LAND USES AND SETTING: See Chapter 2, Proposed Project Description.

OTHER PUBLIC AGENCY APPROVALS: The City is required to submit the Draft 2021 – 2029 Housing Element Update to the State of California Housing and Community Development Department (HCD) for review, comment and certification. The California Department of Forestry and Fire Protection (CalFire) is required to review the City's updated Draft Safety Element.

Environmental Factors Potentially Affected

Based upon the initial evaluation presented in the following IS, it is concluded that the proposed project would not result in significant adverse environmental impacts.

ENVIRONMENTAL DETERMINATION

On the basis of the initial evaluation of the attached Initial Study:

☐ I find the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Susan Koleda, Director of Community Development

October 4, 2021
Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on- site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analyses Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significance

IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts:

- A finding of *no impact* is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered *less than significant* if the analysis concludes that it would not cause substantial adverse change to the environment and requires no mitigation.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that it would not cause substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.
- An impact is considered *potentially significant* if the analysis concludes that it could have a substantial adverse effect on the environment.

I. Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION

a. & b. LESS THAN SIGNIFICANT IMPACT. Visual resources can be valued both objectively and subjectively based on their uniqueness, prominence, quality, relationship to community identity, and economic contributions, such as to land values and tourism. Visual resources are important from an aesthetic perspective when, based on the characteristics listed above, they are identified as containing significant scenic value. Within this understanding, a scenic vista can be defined as the public view of an area that is visually or aesthetically unique, such as a valley or a mountain range.

There is one officially designated state scenic highway within the City. The Angeles Crest Scenic Byway, which extends from the City to the Los Angeles County-San Bernardino County Line, is both a National Forest Scenic Byway and an officially designated California Scenic Highway. With the exception of a 1,000 foot-long section in the City, the entire route is part of State Route 2.

As discussed in the City's General Plan Conservation Element, specifically resources identified in Figure CNE-3 Topographic and Visual Resources, development, including landscaping, would significantly alter views from City designated scenic corridors, including: State Route 2 (as it enters and passes through the city); I-210 (as it enters and passes through the city); Foothill Boulevard; and, Verdugo Boulevard east of State Route 2.

A substantial adverse effect to visual resources could result in situations in which a development project introduces physical features that are not characteristic of current development, obstructs an identified public scenic vista, impairs views from other public areas, or has a substantial change to the natural landscape.

The project would not result in any direct physical ground disturbance or housing construction but would provide a planning and policy framework to support future housing development throughout the City. The proposed HEU and SEU would not result in a significant adverse effect on a scenic vista. All future housing development facilitated by the HEU would be subject environmental review under CEQA, the City's development review process, and required to demonstrate consistency with General Plan policies and compliance with City's Municipal Code development standards.

Compliance with General Plan Conservation Policies which require that new developments be subjected to visual impact analyses, integration with the surrounding environment, compliance with design guidelines and community design elements, and preservation of private views, would be required. Therefore, implementation of the proposed project would not substantially damage scenic resources, and significant impacts would not occur.

c. LESS THAN SIGNIFICANT IMPACT. The proposed project does not involve any physical changes to the environment and therefore would not substantially degrade the existing visual character or quality of the City. Future construction of housing projects would be subject to landscape and design requirements consistent with applicable City ordinances, policies, and guidelines. Future projects would be required to be designed consistent with the development controls and design standards identified in the General Plan Land Use Element and Conservation Element, including LUE Goal 5, LUE Policy 5.1.1 through 5.1.4, LUE Policy 5.2.4, CNE Goal 2, CNE Objective 2.1, CNE Policy 2.1.1 through 2.1.6, CNE Objective 2.2, CNE Policy 2.2.2. As the proposed project involves adoption of housing and safety policies and programs only, and no physical changes to the environment, project implementation would result in less than significant impacts.

d. LESS THAN SIGNIFICANT IMPACT. The proposed project does not involve construction and therefore would not create a substantial source of light or glare. Future construction would be developed consistent with Zoning Code Chapter 11.5.06 (Outdoor Lighting Standards). As a result, the project would not create a significant, substantial source of light or glare within the City. In addition, architectural plans for any future buildings would be reviewed by the City prior to the issuance of building permits, including whether the exterior building materials or exterior lights would produce substantial glare. Conformance with the Municipal Code, permit plan checks, and reviews by City Staff would ensure that substantial lighting and glare impacts from future building and development would not be created. Therefore, significant impacts would not occur with project implementation.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR applicable to all future ground disturbing land development projects in the City.

AES-1: Design the project to be consistent with the development controls and design standards identified in the General Plan Land Use Element and Conservation Element, including LUE Goal 5, LUE Policy 5.1.1 through 5.1.4, LUE Policy 5.2.4, CNE Goal 2, CNE Objective 2.1, CNE Policy 2.1.1 through 2.1.6, CNE Objective 2.2, CNE Policy 2.2.2.

AES 2: Setbacks, landscaping, and design features appropriate to substantially preserve public views. Compliance with applicable Zoning standards, Hillside Management Ordinance, Residential Design Guidelines, Preservation and Protection of Designated Trees on Private Property ordinance, and Downtown Village Specific Plan.

AES 3: Comply with applicable LCF General Plan policies and actions and with the City's Outdoor Lighting Standards.

II. Agriculture and Forest Resources *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION

a - e. NO IMPACT. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the City according to the most recent maps of the California Department of Conservation's Farmland Mapping and Monitoring Program. The City is an urbanized and built out area which supports primarily residential and commercial uses. There is no property zoned or used for agriculture, nor properties impacted by Williamson Act contracts in City. There is no property zoned or used for forest land, timberland or timberland zoned Timberland Production within city. As a result, the proposed project would not convert any farmland to non-agricultural use, or forest land to non-forest use, or conflict with existing agricultural, or timberland zoning or Williamson Act contracts. Therefore, implementation of the proposed project would not result in any impacts to agricultural or forestry resources.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

III. Air Quality *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SETTING

EXISTING CONDITIONS

The city is located in the South Coast Air Basin (SCAB), an area of approximately 6,745 square miles bounded by the Pacific Ocean to the west and south and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the SCAB, which is a coastal plain with connecting broad valleys and low hills.

The SCAB lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (weather and topography) as well as human-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the SCAB, making it an area of high pollution potential.

The greatest air pollution impacts in the SCAB occur from June through September, mainly because of the combination of large amounts of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, causing elevated air pollution levels. Pollutant concentrations in the SCAB vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the SCAB and adjacent desert.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

The SCAQMD is the regulatory agency responsible for improving air quality in the SCAB. The SCAQMD is responsible for controlling emissions primarily from stationary sources of air pollution. These can include

anything from large power plants and refineries to the corner gas station. There are about 28,400 such businesses operating under SCAQMD permits. Many consumer products are also considered stationary sources; these include house paint, furniture varnish, and thousands of products containing solvents that evaporate into the air. About 25% of the SCAB's ozone-forming air pollution comes from stationary sources, both businesses and residences. The other 75% comes from mobile sources–mainly cars, trucks and buses, but also construction equipment, ships, trains and airplanes. Emission standards for mobile sources are established by state or federal agencies, such as the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (U.S. EPA), rather than by local agencies such as SCAQMD.

LOCAL AIR QUALITY

The SCAQMD has divided the SCAB into air monitoring areas and maintains a network of air quality monitoring stations located throughout the SCAB. The city is in the West San Gabriel Valley Monitoring Area. The nearest monitoring station is the Pasadena Monitoring Station, in the City of Pasadena at S. Wilson Avenue. Criteria pollutants monitored at the Pasadena Station include CO, nitrogen dioxide (NO_2), ozone, and fine particulate matter (PM2.5). There are no monitoring stations within the West San Gabriel Valley Monitoring Area that monitor coarse particulate matter (PM10). Table AQ-1 displays air quality monitoring data from the Pasadena Monitoring Station for the last three years (2017-2019).

TABLE AQ-1 AIR QUALITY MONITORING DATA FROM PASADENA MONITORING STATION (2017-2019)

Pollutant	Standard[1]	2017	2018	2019
Ozone				
Maximum Concentration (1-hour/ 8-hour average)	ppm	**0.139/0.100** [1]	**0.112/0.091** [1]	**0.120/0.098** [1]
Number of days State standard exceeded (1-hour/ 8-hour)	0.09/0.070	18/38	8/20	11/29
Number of days National standard exceeded (8-hour)	0.070	36	19	24
Nitrogen Dioxide (NO_2)				
Maximum Concentration (1-hour)	ppm	0.072	0.068	0.059
Annual Average Concentration	ppm	0.015	0.014	0.013
Number of days 1-hour standard exceeded (State/National)	0.030/0.053	0/0	0/0	0/0
State Annual Average Exceeded?	0.018	No	No	No
Fine Particulate Matter (PM2.5)				
Maximum Concentration (24-hour)	µg/m³	22.8	32.5	**41.8** [1]
Annual Average Concentration	µg/m³	9.7	10.3	8.7
Number of days National standard exceeded (24-hour measured/estimated)	35	0/0	0/0	**1/3.1**
Annual Average Exceeded (State/National)?	12/12.0	No/No	No/No	No/No

Source: California Air Resources Board, iADAM: Air Quality Data Statistics, https://www.arb.ca.gov/adam/topfour/topfourdisplay.php

ppm = parts per million, µg/m³ = micrograms per cubic meter
*1 **bold values** exceeded the State and/or National standard*

FEDERAL CLEAN AIR ACT

The 1970 Federal Clean Air Act (FCAA) authorized the establishment of national health-based air quality standards and also set deadlines for their attainment. The FCAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required of areas of the nation that exceed the standards. Under the FCAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans to demonstrate how they will achieve the national standards by specified dates. The FCAA requires that all projects receiving federal funds demonstrate conformity to the approved State Implementation Plan and local air quality attainment plan for the region.

CALIFORNIA CLEAN AIR ACT

The California Clean Air Act (CCAA) provides local air quality districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the CCAA. Each nonattainment district is required to adopt a plan to achieve a five percent annual reduction, averaged over consecutive three-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

CRITERIA AIR POLLUTANTS

Concentrations of criteria air pollutants are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 micrometers (coarse or PM10), particulate matter less than 2.5 micrometers (fine or PM2.5), and lead. However, ozone, PM10, and PM2.5 are the criteria air pollutants of primary concern in the SCAB due to their nonattainment status with respect to the applicable National Ambient Air Quality Standards (NAAQS) and/or California Ambient Air Quality Standards (CAAQS). The SCAB is in nonattainment for 1-hour and 8-hour ozone CAAQS and NAAQS, 24-hour and annual PM10 CAAQS, and 24-hour and annual CAAQS and NAAQS. The SCAB is in attainment or unclassified for all other criteria pollutants.

SCAQMD 2016 AIR QUALITY MANAGEMENT PLAN

SCAQMD recently approved the 2016 Air Quality Management Plan (AQMP) on March 3, 2017 that demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual PM2.5 standards. The 2016 AQMP includes the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP also includes transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).

SCAQMD RULES AND REGULATIONS

All projects are subject to adopted SCAQMD rules and regulations in effect at the time of construction. Specific rules applicable to the construction of the project may include but are not limited to the following:

- Regulation IV, Rule 402: Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause or have natural tendency to cause injury or damage to business or property.

- Regulation IV, Rule 403: Fugitive Dust. The developer or contractor is required to implement Best Available Control Measures for all sources, and all forms of visible PM are prohibited from crossing any property line.
- Regulation XI, Rule 1113: Architectural Coatings. The manufacturer, distributor, and end user of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- Regulation XII, Rule 1186: PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations. The purpose of this rule is to reduce the amount of PM entrained in the ambient air as a result of vehicular travel on paved and unpaved public roads.
- Regulation XIV, Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. The owner or operator of any demolition or renovation activity is required to have an asbestos study performed prior to demolition and to provide notification to SCAQMD prior to commencing demolition activities.

SCAQMD SIGNIFICANCE THRESHOLDS

The SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. Projects in the SCAB would generate significant emissions if daily emissions would exceed the regional thresholds of significance shown in Table AQ-2.

TABLE AQ-2 SCAQMD REGIONAL THRESHOLDS OF SIGNIFICANCE

Pollutant	Construction (pounds per day)	Operations (pounds per day)
NO_x	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SO_x	150	150
CO	550	550

Source: South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, April 2019. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf

SENSITIVE RECEPTORS

Some people are particularly sensitive to air pollution, including persons with respiratory illnesses or impaired lung function because of other illnesses, the elderly, and children. Facilities and structures where these people live or spend considerable amounts of time are known as sensitive receptors. The SCAQMD defines land uses considered to be sensitive receptors as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. SCAQMD's 2016 AQMP includes the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP also includes transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS). The SCAQMD is currently preparing the 2022 AQMP to address the requirements for meeting the 2015 ozone NAAQS, which will represent a comprehensive analysis of emissions, metrology, regional air quality modeling, regional growth projections and impact of

existing and proposed control measures. The 2022 AQMP will be based upon the regional growth projections from the SCAG 2020 RTP/SCS. The regional growth projections from the SCAG 2020 RTP/SCS includes the RHNA for the region. Thus, the 2022 AQMP will include the growth accommodated by the project. Furthermore, the project would comply with applicable SCAQMD Rules and Regulations. Therefore, this impact would be less than significant.

b. LESS THAN SIGNIFICANT IMPACT. There is no specific proposed development under the project at this time. Future development proposals consistent with the Housing Element Update would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potentially significant air quality impacts. Because the details regarding future development are not known at this time, construction and operational emissions are analyzed qualitatively.

CONSTRUCTION-RELATED EMISSIONS

Construction activities associated with individual development projects under the Housing Element Update would generate an increase in criteria air pollutants. SCAQMD has developed project-level thresholds for construction activities. Subsequent environmental review of future development projects would be required to assess potential impacts under SCAQMD's project-level thresholds. Construction emissions from buildout of future projects within the City would primarily be: (1) exhaust emissions from off-road diesel-powered construction equipment; (2) dust generated by demolition, grading, earthmoving, and other construction activities; (3) exhaust emissions from on-road vehicles; and (4) off-gas emissions of VOCs from application of asphalt, paints, and coatings. Individual development projects under the Housing Element Update would be subject to adopted SCAQMD rules and regulations in effect at the time of construction, such as Regulation IV, Rule 403, which limits fugitive dust and Regulation XI, Rule 1113, which limits VOC emissions in architectural coatings. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

OPERATIONAL-RELATED EMISSIONS

The operation of individual development projects under the Housing Element Update would generate an increase in criteria air pollutants. SCAQMD has developed project-level thresholds for construction activities. Subsequent environmental review of future development projects would be required to assess potential impacts under SCAQMD's project-level thresholds. Operational emissions from buildout of future projects within the City would primarily be: (1) exhaust emissions from on-road vehicles; (2) exhaust emissions from landscaping equipment; and (3) off-gas emissions of VOCs from application of paints and typical household chemicals. As discussed in Impact a), SCAQMD's 2022 AQMP will include the growth accommodated by the Housing Element Update including the mobile emissions based on regional growth projections from the SCAG 2020 RTP/SCS. Furthermore, operation of the project would comply with applicable SCAQMD Rules and Regulations. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

c. LESS THAN SIGNIFICANT IMPACT. The SCAQMD defines land uses considered to be sensitive receptors as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities. In 1998, CARB classified diesel particulate matter (DPM) as a toxic air contaminant (TAC), citing its potential to cause cancer and other health problems. U.S. EPA concluded that long-term exposure to diesel engine exhaust is likely to pose a lung cancer hazard to humans and can also contribute to other acute and chronic health effects.

Construction associated with future individual development projects under the Housing Element Update would temporarily generate TACs from onsite construction equipment and haul trucks that could expose existing sensitive receptors to TACs. Furthermore, the citing of individual development projects within close proximity to existing sources of TACs (i.e. stationary sources permitted by SCAQMD, highways and freeways) could expose future sensitive receptors to TACs. Future development projects would be subject to SCAQMD's health risk thresholds of significance on a case-by-case basis at the discretion of the City based on the specific construction details and locations of future projects. Since no specific development projects are proposed at this time and future development projects consistent with the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

d. LESS THAN SIGNIFICANT IMPACT. Future individual development projects under the Housing Element Update would not include sources of objectionable odors or other emissions that could adversely affect a substantial number of people. Residential projects do not create substantial odors, thus this impact would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

AQ-1: Compliance with South Coast AQMD Rule Book. (http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book),

AQ-2: If the development review identifies construction emissions that exceed SCAQMD mass emission thresholds, avoidance or minimization measures shall be developed and implemented to ensure that emissions will be reduced below their respective thresholds. In addition to compliance with regulatory measures (including compliance with SCAQMD Rules and Regulations), the City shall require all new construction projects to incorporate all feasible mitigation where appropriate.

Potential measures to reduce fugitive dust emissions include but are not limited to the following:

- Active grading sites will be watered one additional time per day beyond that required by Rule 403.
- Contractors will apply approved nontoxic chemical soil stabilizers to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas inactive for 10 days or more).
- Construction contractors will provide temporary wind fencing around sites being graded or cleared.
- Trucks hauling dirt, sand, or gravel will be covered or will maintain at least 2 feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Construction contractors will install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off tires of vehicles and any equipment leaving the construction site.
- Traffic speeds on all unpaved roads will be reduced to 15 mph or less.

- Temporary traffic controls such as a flag person will be provided during all phases of construction to maintain smooth traffic flow.
- Construction activities that affect traffic flow on the arterial system will be conducted during off-peak hours to the extent practicable.
- The grading contractor will suspend all soil disturbance activities when winds exceed 25 mph or when visible dust plumes emanate from a site; disturbed areas will be stabilized if construction is delayed.

AQ-3: Potential measures to reduce emissions of ozone precursors (ROG and NO_x) and particulates (PM_{10} and $PM_{2.5}$) associated with construction equipment exhaust include but are not limited to the following:

- Use construction equipment rated by the EPA as having Tier 3 or higher exhaust emission limits.
- Use diesel oxidation catalysts and catalyzed diesel particulate traps.
- Maintain equipment according to manufacturers' specifications.
- Restrict idling of construction equipment to a maximum of 5 minutes when not in use.
- Install high-pressure fuel injectors on construction equipment vehicles.
- Re-route construction trucks away from congested streets or sensitive receptor areas

AQ-4: Potential measures to reduce emissions of the ozone precursors (ROG) from architectural coatings include but are not limited to the following:

- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible.

AQ-5: If the development review identifies potential health risk associated with siting residences near existing pollutant sources, avoidance or minimization measures shall be developed that ensure that the health risk be reduced to a level below SCAQMD thresholds for health risk. Measures shall be specific to each project and be determined during project design and/or development review. Potential building design measures to reduce the health risk associated with development within proximity (i.e., within 500 feet) of busy roadways (e.g. I-210 and SR-2) include, but are not limited to, the following:

- Plant vegetation, preferably tall and finely-needled trees, between receptor and roadway;
- Construct wall barriers between receptor and roadway that reduce the line of sight between the potential receptors and pollutant sources;
- Install only fixed windows;
- Install a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency particulate air (HEPA) filters (MERV-13 or higher), and develop a maintenance plan to ensure the filtering system is properly maintained; and
- Locate air intake systems for HVAC systems as far away from the existing air pollution sources as possible.

AQ-6: Avoidance and Minimization Measures for Construction Emissions. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City

ordinance: If the development review identifies construction emissions that exceed SCAQMD mass emission thresholds, avoidance or minimization measures shall be developed and implemented to ensure that emissions will be reduced below their respective thresholds. In addition to compliance with regulatory measures (including compliance with SCAQMD Rules and Regulations), the City shall require all new construction projects to incorporate all feasible mitigation where appropriate.

Potential measures to reduce fugitive dust emissions include but are not limited to the following:

- Active grading sites will be watered one additional time per day beyond that required by Rule 403.
- Contractors will apply approved nontoxic chemical soil stabilizers to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas inactive for 10 days or more).
- Construction contractors will provide temporary wind fencing around sites being graded or cleared.
- Trucks hauling dirt, sand, or gravel will be covered or will maintain at least 2 feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Construction contractors will install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off tires of vehicles and any equipment leaving the construction site.
- Traffic speeds on all unpaved roads will be reduced to 15 mph or less.
- Temporary traffic controls such as a flag person will be provided during all phases of construction to maintain smooth traffic flow.
- Construction activities that affect traffic flow on the arterial system will be conducted during off-peak hours to the extent practicable. The grading contractor will suspend all soil disturbance activities when winds exceed 25 mph or when visible dust plumes emanate from a site; disturbed areas will be stabilized if construction is delayed.

In addition, potential measures to reduce emissions of ozone precursors (ROG and NOx) and particulates (PM10 and PM2.5) associated with construction equipment exhaust include but are not limited to the following:

- Use construction equipment rated by the EPA as having Tier 3 or higher exhaust emission limits.
- Use diesel oxidation catalysts and catalyzed diesel particulate traps.
- Maintain equipment according to manufacturers' specifications.
- Restrict idling of construction equipment to a maximum of 5 minutes when not in use.
- Install high-pressure fuel injectors on construction equipment vehicles.
- Re-route construction trucks away from congested streets or sensitive receptor areas
- Potential measures to reduce emissions of the ozone precursors (ROG) from architectural coatings include but are not limited to the following:
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible.

AQ-7: Building Design Measures. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the development review identifies potential health risk associated with siting residences near existing pollutant sources, avoidance or minimization measures shall be developed that ensure that the health risk be reduced to a level below SCAQMD thresholds for health risk. Measures shall be specific to each project and be determined during project design and/or development review. Potential building design measures to reduce the health risk associated with development within proximity (i.e., within 500 feet) of busy roadways (e.g., I-210 and SR-2) include, but are not limited to, the following:

- plant vegetation, preferably tall and finely needled trees, between receptor and roadway;
- construct wall barriers between receptor and roadway that reduce the line of sight between the potential receptors and pollutant sources;
- install only fixed windows;
- install a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency particulate air (HEPA) filters (MERV-13 or higher), and develop a maintenance plan to ensure the filtering system is properly maintained; and
- locate air intake systems for HVAC systems as far away from the existing air pollution sources as possible.

IV. Biological Resources *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION

a. - f. NO IMPACT. The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Additionally, given the City's existing developed nature, the candidate housing sites mostly include properties that are developed and adjacent to existing development. However, future housing development could impact candidate, sensitive, or special status wildlife or plant species through direct or indirect disturbance or elimination of essential habitat.

The project involves the adoption of goals, policies and programs intended to provide future housing opportunities and to promote public safety in the City. Given their nature and scope, the proposed Housing Element and Safety Element Update programs and policies would not result in physical environmental impacts. Additionally, the HEU does not grant any development entitlements or authorize development. Therefore, the project does not have the potential to result in a "taking" of a species listed, or proposed for listing, or a candidate for listing under the state and/or federal Endangered Species Act, or protected by the Migratory Bird Treaty Act, or otherwise considered to have a special status in local plans, or to substantially modify the habitat for such species.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA and the City's development review process, which includes site-specific analysis where sensitive vegetation communities are assumed to be present. Surveys would verify and confirm the presence of sensitive vegetation communities and determine the extent of any potential impacts and the need for mitigation. All future housing development facilitated by the HEU would be required to demonstrate compliance with federal, state, and local requirements aimed at protecting biological resources, including those in the City's General Plan. Additionally, all future housing development facilitated by the HEU would be required to comply with Mitigation Measures listed below and included in Attachment B (which includes General Plan EIR standard Mitigation Measures as well as additional Mitigation Measures from the City's Draft Local CEQA Guidelines) for avoiding and minimizing construction and operations impacts to riparian habitat or other sensitive vegetation communities. Therefore, the HEU would not result in substantial adverse effect, either directly or indirectly, on any sensitive vegetation communities.

The project would not result in any changes to habitat value or species composition, such as habitat fragmentation, removal of understory, alteration to drainage patterns, disruption of the canopy, and/or removal of a significant number of trees.

The project would not result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or threaten the continuity of wetland-dependent animal or plant species. The project would not affect wildlife access, use, and dispersal in wetland areas and between contiguous habitats through riparian areas. The project would not affect hydrological conditions of any wetlands. The project would not affect wildlife movement within the Arroyo Seco or foothills of the San Gabriel Mountains adjacent to the Angeles National forest.

The project would not include removal of any trees protected by LCFMC Chapter 11.40 (Preservation and Protection of Designated Trees on Private Property) or off-site trees protected by LCFMC Chapter 4.24 (Trees in the Public Right-of-Way).

All future housing development facilitated by the HEU would be subject to the City's development review process, which includes site-specific analysis. All future housing development would be required to demonstrate compliance with federal, state, and local regulations aimed at protecting biological resources, including those in the City's General Plan. There is no approved Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan applicable to the City. Consequently, implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources, and significant impacts would not occur with project implementation.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below describes the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

BIO-1: Habitat Assessment and Focused Surveys for Special-Status Species:

Prior to the issuance of any grading, building, or other construction permit for undeveloped parcels (excludes previously developed parcels) in the Project area, a habitat assessment shall be conducted for the parcel to determine whether the potential exists for special-status species to occur. If the habitat assessment identifies potentially suitable habitat for threatened and endangered species, focused surveys shall be conducted by a qualified biologist to determine presence or absence. Early consultation with the wildlife agencies (i.e., USFWS, CDFG) shall be undertaken for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization.

If threatened and endangered species are observed/detected, project-specific mitigation measures shall be developed to mitigate impacts on threatened and endangered species to below a level of significance. This shall apply to all projects if there is a potential to disturb habitat, including grading and other ministerial construction permits. Specific measures shall include, as appropriate:

- Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of impacts on listed species.
- The use of fencing or flagging to identify sensitive areas that support the listed species and to ensure that the areas are protected from direct and indirect impacts.
- Implementation of noise reduction measures (e.g., noise attenuation structures) within habitats occupied by listed avian species, and noise monitoring during the breeding season.
- Identification and transplantation of listed plant species populations in accordance with best practices.
- Prohibition on construction activities during the breeding seasons for listed species such, as:
- Arroyo toad: March 15 to July 31
- Least Bell's vireo: March 15 to September 15
- Willow flycatcher (all subspecies): March 15 to September 15
- Coastal California gnatcatcher: February 15 to August 31

BIO-2: Birds Nest Avoidance: If construction activities occur between January 15 and August 31, a preconstruction survey (within 7 days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within or adjacent to the area proposed for development in order to avoid the nesting activities of breeding birds/raptors.

BIO-3: If nesting activities within 200 feet of the proposed work area are not detected, construction activities may proceed. If nesting activities are confirmed, construction activities shall be delayed within an appropriate buffer from the active nest until the young birds have fledged and left the nest or until the nest is no longer active as determined by a qualified biologist. The size of the appropriate buffer shall be determined by a qualified biologist based on field conditions.

BIO-4: Prior to the initiation of future development projects within the Project area that have the potential to adversely affect sensitive habitat including ministerial grading and other construction-related actions, a habitat assessment shall be conducted when warranted in

areas undisturbed by prior development to determine whether sensitive natural communities (including riparian vegetation) are present. If the habitat assessment identifies sensitive natural communities, a biological report shall be prepared to address impacts on sensitive natural communities resulting from the proposed future project. The report shall identify mitigation measures to reduce all significant impacts to below a level of significance. Mitigation measures shall include, but are not limited to the following, as determined appropriate by a qualified biologist in consultation with the wildlife agencies.

- Early consultation with the wildlife agencies (i.e., USFWS, CDFG) for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization.
- Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of sensitive habitats.
- The use of fencing or flagging to identify and avoid sensitive areas and to ensure that the areas are protected from direct and indirect impacts.
- Appropriate siting of staging areas within developed or disturbed areas, ensuring such areas are outside of existing sensitive habitats.
- Provision of mitigation at a minimum of a 1:1 ratio to ensure no net loss of sensitive habitat. Consultation with the wildlife agencies or professional best practices may result in higher ratios.

BIO-5: If a habitat assessment identifies potential federal and/or state jurisdictional waters, a formal jurisdictional delineation shall be prepared. This document will map the jurisdictional waters present and overlay it on the grading footprint of the project, thereby allowing a calculation of the total impacts. If jurisdictional waters are to be affected, mitigation is required at a minimum 1:1 ratio, but coordination with United States Army Corps of Engineers (through the Section 404 process) and California Department of Fish and Wildlife (through the Section 1602 Streambed Alteration Agreement process) may determine a higher ratio is required. Mitigation will be achieved through a combination of in-kind creation, restoration, and/or enhancement as determined to be appropriate for each site through consultation with the resource agencies. Mitigation will first be considered on site, then with an approved mitigation bank, and thirdly through offsite mitigation. The appropriate permit applications will be submitted to state and federal regulatory agencies. The permits issued by these agencies will finalize the mitigation requirements.

BIO-6: If a habitat assessment identifies that a specific development project will interfere substantially with wildlife movement or established wildlife corridors, avoidance and minimization measures shall be developed that ensure the continued movement of wildlife through a specific corridor or area. Measures shall be specific to each project and be determined by a qualified biologist during project design; however, the following minimization measures shall be incorporated where appropriate, as determined by a qualified biologist:

- Project design shall be sensitive to wildlife movement and, if a corridor is determined to be located on site, the project shall be designed to avoid segmentation of the corridor and the continued viability of the corridor.
- Street lighting shall be designed such that it does not increase the overall ambient lighting and glare in the natural area. This may be accomplished by designing street lighting with internal baffles to direct the lighting towards the ground and so there is a zero side angle cut off to the horizon.

- Potential noise, motion, and human intrusion impacts shall be minimized by incorporating setbacks, berms, or walls into the project design. Construction-related noise shall be mitigated consistent with the City's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be equipped with mufflers.
- Plant species acceptable for the project's landscaping must not include any invasive species, as identified by the California Invasive Plant Council (http://www.cal-ipc.org/ip/inventory/index.php).
- When culverts are included in a project design within areas known to be used as wildlife crossings, they shall be placed in locations suitable for use by wildlife and shall be sized and shaped such as to facilitate wildlife movement through the culvert.

BIO-7: Prior to issuance of any building permit for a new structure or expansion of the footprint of an existing structure no matter how small, or for the addition of a second story, grading permit, or permit for demolition, the applicant shall submit a tree plan to the City. The tree plan shall provide the following information and is subject to all provisions listed below:

- The location of all protected trees as defined in Section 11.40 of the City Municipal Code. For all projects requiring discretionary City review, tree identification tags that correspond with the submitted plan shall be installed for field verification. For projects on non-residential property, all trees shall be indicated.
- The plan shall show the location, size, and species of all trees to be removed, the reason for removal, and all trees to be retained. Any trees proposed for removal due to poor health or condition shall have the condition of the tree documented in a letter report prepared and signed by an arborist certified by the International Society of Arboriculture (ISA).
- The plan shall show the existing and proposed grades, existing and proposed improvements, and septic tanks and utility lines located within 30 feet of potentially removed trees, retained trees, and trees to be planted.
- During the construction phase, all applicants shall comply with tree protection guidelines as defined in Section 11.40.070 of the City Municipal Code.
- The director of community development shall notify the applicant of the requirement to obtain a tree removal permit for those trees on the tree plan that are intended to be removed and which are subject to the provisions of the City Municipal Code.
- Arborist review of the tree plan may be required per the determination of the director of community development or his/her designee.

BIO-8: Habitat Assessment and Focused Surveys for Special-Status Species. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to the issuance of any grading, building, or other construction permit for undeveloped parcels in the Project area, a habitat assessment shall be conducted for the parcel to determine whether the potential exists for special-status species to occur. If the habitat assessment identifies potentially suitable habitat for threatened and endangered species, focused surveys shall be conducted by a qualified biologist to determine presence or absence. Early consultation with the wildlife agencies (i.e., USFWS, CDFG) shall be undertaken for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization.

If threatened and endangered species are observed/detected, project-specific mitigation measures shall be developed to mitigate impacts on threatened and endangered species to below a level of significance. This shall apply to all projects if there is a potential to disturb habitat, including grading and other ministerial construction permits. Specific measures shall include, as appropriate:

- Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of impacts on listed species.
- The use of fencing or flagging to identify sensitive areas that support the listed species and to ensure that the areas are protected from direct and indirect impacts.
- Implementation of noise reduction measures (e.g., noise attenuation structures) within habitats occupied by listed avian species, and noise monitoring during the breeding season.
- Identification and transplantation of listed plant species populations in accordance with best practices.

Prohibition on construction activities during the breeding seasons for listed species such, as:

- Arroyo toad: March 15 to July 31
- Least Bell's vireo: March 15 to September 15
- Willow flycatcher (all subspecies): March 15 to September 15
- Coastal California gnatcatcher: February 15 to August 31

If no threatened or endangered species are observed or detected during focused surveys, but potentially suitable habitat for non-threatened and non-endangered plant or wildlife species is present, a site-specific determination shall be made as to whether the potential impacts are significant based on the degree of threat and the size of the population/occupied habitat to be impacted. Focused surveys may be required in order to make a significance determination, depending on the species to be impacted and the size of the project. The measures described above shall be employed as appropriate.

BIO-9: Bird Nest Avoidance. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If construction activities occur between January 15 and August 31, a preconstruction survey (within 7 days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within or adjacent to the area proposed for development in order to avoid the nesting activities of breeding birds/raptors.

If nesting activities within 200 feet of the proposed work area are not detected, construction activities may proceed. If nesting activities are confirmed, construction activities shall be delayed within an appropriate buffer from the active nest until the young birds have fledged and left the nest or until the nest is no longer active as determined by a qualified biologist. The size of the appropriate buffer shall be determined by a qualified biologist based on field conditions.

BIO-10: Habitat Assessment/Biology Report. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to the initiation of future development projects within the Project area that have the potential to adversely affect sensitive habitat including ministerial grading and other construction-related actions, a habitat

assessment shall be conducted when warranted in areas undisturbed by prior development to determine whether sensitive natural communities (including riparian vegetation) are present. If the habitat assessment identifies sensitive natural communities, a biological report shall be prepared to address impacts on sensitive natural communities resulting from the proposed future project. The report shall identify mitigation measures to reduce all significant impacts to below a level of significance. Mitigation measures shall include, but are not limited to the following, as determined appropriate by a qualified biologist in consultation with the wildlife agencies.

- Early consultation with the wildlife agencies (i.e., USFWS, CDFW) for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization.
- Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of sensitive habitats.
- The use of fencing or flagging to identify and avoid sensitive areas and to ensure that the areas are protected from direct and indirect impacts.
- Appropriate siting of staging areas within developed or disturbed areas, ensuring such areas are outside of existing sensitive habitats.
- Provision of mitigation at a minimum of a 1:1 ratio to ensure no net loss of sensitive habitat. Consultation with the wildlife agencies or professional best practices may result in higher ratios.

BIO-11: Formal Jurisdictional Delineation. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the habitat assessment described in mitigation measure MM BIO-3 identifies potential federal and/or state jurisdictional waters, a formal jurisdictional delineation shall be prepared. This document will map the jurisdictional waters present and overlay it on the grading footprint of the project, thereby allowing a calculation of the total impacts. If jurisdictional waters are to be affected, mitigation is required at a minimum 1:1 ratio, but coordination with USACE (through the Section 404 process) and CDFG (through the Section 1602 Streambed Alteration Agreement process) may determine a higher ratio is required. Mitigation will be achieved through a combination of in-kind creation, restoration, and/or enhancement as determined to be appropriate for each site through consultation with the resource agencies. Mitigation will first be considered on site, then with an approved mitigation bank, and thirdly through offsite mitigation. The appropriate permit applications will be submitted to state and federal regulatory agencies. The permits issued by these agencies will finalize the mitigation requirements

BIO-12: Avoidance and Minimization Measures for Wildlife Use. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the habitat assessment described in mitigation measure MM BIO-3 identifies that a specific development project will interfere substantially with wildlife movement or established wildlife corridors, avoidance and minimization measures shall be developed that ensure the continued movement of wildlife through a specific corridor or area. Measures shall be specific to each project and be determined by a qualified biologist during project design; however, the following minimization measures shall be incorporated where appropriate, as determined by a qualified biologist:

- Project design shall be sensitive to wildlife movement and, if a corridor is determined to be located on site, the project shall be designed to avoid segmentation of the corridor and the continued viability of the corridor.
- Street lighting shall be designed such that it does not increase the overall ambient lighting and glare in the natural area. This may be accomplished by designing street lighting with internal baffles to direct the lighting towards the ground and so there is a zero side angle cut off to the horizon.
- Potential noise, motion, and human intrusion impacts shall be minimized by incorporating setbacks, berms, or walls into the project design. Construction-related noise shall be mitigated consistent with the City's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be equipped with mufflers.
- Plant species acceptable for the project's landscaping must not include any invasive species, as identified by the California Invasive Plant Council (http://www.cal-ipc.org/ip/inventory/index.php).
- When culverts are included in a project design within areas known to be used as wildlife crossings, they shall be placed in locations suitable for use by wildlife and shall be sized and shaped such as to facilitate wildlife movement through the culvert.

BIO-13: Tree Plan. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to issuance of any building permit for a new structure or expansion of the footprint of an existing structure no matter how small, or for the addition of a second story, grading permit, or permit for demolition, the applicant shall submit a tree plan to the City. The tree plan shall provide the following information and is subject to all provisions listed below:

- The location of all protected trees as defined in Section 4.26.030.A.l of the City Municipal Code. For all projects requiring discretionary City review, tree identification tags that correspond with the submitted plan shall be installed for field verification. For projects on non-residential property, all trees shall be indicated.
- The plan shall show the location, size, and species of all trees to be removed, the reason for removal, and all trees to be retained. Any trees proposed for removal due to poor health or condition shall have the condition of the tree documented in a letter report prepared and signed by an arborist certified by the International Society of Arboriculture (ISA).
- The plan shall show the existing and proposed grades, existing and proposed improvements, and septic tanks and utility lines located within 30 feet of potentially removed trees, retained trees, and trees to be planted.
- During the construction phase, all applicants shall comply with tree protection guidelines as defined in Section 4.26.040 of the City Municipal Code.
- The director of community development shall notify the applicant of the requirement to obtain a tree removal permit for those trees on the tree plan that are intended to be removed and which are subject to the provisions of the City Municipal Code.
- Arborist review of the tree plan may be required per the determination of the director of community development or his/her designee. Said arborist shall be contracted and managed by the City, and all fees incurred shall be the responsibility of the property owner.

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

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. Based on National Register of Historical Places (NRHP) guidelines, generally, structures 50 years of age or older could be a historic resource. Project implementation has the potential for development over the next ten or more years. All candidate housing sites, except vacant sites, are developed. The existing buildings/structures on the candidate housing sites could be 50 years of age or older, or could reach 50 years during HEU implementation. Therefore, any candidate housing site that is presently developed has the potential to contain a historical structure(s) during HEU implementation.

As previously noted, the project would not result in direct housing construction, but would facilitate future housing development, which is anticipated to occur in urbanized areas throughout the City. The project would also promote Citywide public safety goals, policies and programs. The City adopted a Historic Preservation Ordinance and Historic Registry in 2020. As no construction or ground disturbing activities would occur, the project would not adversely affect any historic resources including those in the City's Historic Registry. Therefore, implementation of the proposed project would have no adverse impacts on any historic resources.

b - c. LESS THAN SIGNIFICANT IMPACT. Tribal consultation was coordinated by the City per the requirements of AB 52 and SB 18 as part of the CEQA NOP process in February 2021. All tribal contacts provided by the Native American Heritage Commission (NAHC) were contacted. One comment letter on the NOP was received by a local tribe who indicated that since the project would not involve any ground disturbing activities, no consultation was requested/required.

IMPACTS ON ARCHEOLOGICAL RESOURCES

As noted above, no ground disturbing activities are proposed by the project. Therefore, no effects on known significant archeological resources under CEQA would occur with the project. Future land development projects would be required to conduct a sacred lands records search, review maps and aerials photos, as well conduct pedestrian surveys. Given the cultural sensitivity of the City, there is a potential for unknown subsurface cultural resources (pre-contact and historic) to be discovered during ground disturbing activities (such as grading) during future development. The inadvertent discovery of unknown subsurface archeological resources associated with future potential ground disturbing projects would be a potentially significant impact under CEQA. However, with the implementation of Mitigation Measures listed below and

included in Attachment B, potentially significant impacts to archaeological resources as a result of future ground disturbing activities would be reduced to less than significant levels.

IMPACTS ON HUMAN REMAINS

The project would not affect any dedicated cemeteries as no construction or ground disturbing activities are proposed by the project. Therefore no impacts on human remains or cemeteries would occur with project implementation.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. The list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City. Please also refer to the Mitigation Measures included below under Section XVIII, Tribal Cultural Resources. CUL -1: The evaluation shall be performed by a historian or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for Historic Preservation Professionals. The potentially historic building/structure shall be evaluated according to the NRHP criteria A–C and CRHR criteria 1–3.

CUL-2: Projects that have the potential to impact archaeological resources shall obtain a qualified archaeologist and Native American consultant, if applicable, to conduct a pedestrian survey and records search to determine the potential for the project area to contain significant archaeological resources. A qualified archaeologist shall be a registered professional archaeologist and possess an advanced degree in archaeology, history, or a related discipline. The findings from the pedestrian survey and records search shall be included in a brief archaeological letter report. The report shall indicate whether the project area has a low, moderate, or high potential to contain prehistoric and historic archaeological resources. Projects characterized by no known resources and a low potential for unknown archaeological resources shall not involve any additional investigative work nor require any mitigation related to archaeological resources.

CUL-3: Projects in areas having known resources or a moderate to high potential for significant resources shall undergo test and evaluation to determine if potentially significant archaeological resources are present. A Native American consultant shall be retained for projects involving prehistoric or ethnohistoric resources. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.

CUL-4: Monitoring during construction grading or trenching may be required if there is a potential for encountering subsurface cultural resources. This requirement would derive from the management recommendations of either the test and evaluation report or the data recovery report. When invoked, the project applicant must provide written proof that a qualified archaeologist and a Native American monitor, if applicable, have been retained to observe all earth-disturbing activities.

CUL-5: Prior to beginning fieldwork on any new projects, the project applicant and their contractors and subcontractors shall be informed of their legal obligations in the event of the discovery of human remains during excavation or trenching. These obligations derive from the State of California Health and Safety Code Section 7050.5 and PRC 5097.98. The discovery of human remains or presumed human remains requires that the area of the discovery be protected from further disturbance and that an immediate call be made to the County Coroner. If the Coroner determines that the remains are prehistoric, the Coroner, and only the Coroner, is authorized to contact the Native American Heritage Commission. They, in turn, will determine and notify a Most Likely Descendent (MLD) from the local Native American community. Meaningful consultation between the MLD, qualified archaeologist, project applicant, and the City shall establish a Memorandum of Understanding detailing a reasonable course of action that will reduce adverse impacts to a level less than significant. The Memorandum of Understanding and technical reports from the MLD and the qualified archaeologist shall be submitted and distributed as required.

CUL-6: Historic Building/Structure Evaluation. Prior to future project approval and the issuance of any construction permit within the city, including but not limited to a demolition or building permit, and if research indicates that any onsite building(s) or structure(s) is 45 years or older, the applicant shall be required to conduct an evaluation of the onsite building(s) or structure(s) to determine if it is eligible for inclusion in the state or local historical registers as required by the City's adopted Historic Preservation ordinance. The evaluation shall be performed by a historian or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for Historic Preservation Professionals. The potentially historic building/structure shall be evaluated according to the NRHP criteria A–C and CRHR criteria 1–3. The historian/architectural historian shall consult with knowledgeable local groups and individuals, appropriate archives, and appropriate repositories in an effort to identify the original and subsequent owners as well as the architect and the builder to establish whether any of these individuals played important roles in local or regional history (criterion B). Additionally, the physical characteristics and condition of the building or structure shall be evaluated under criterion C, and those judged to possess "the distinctive characteristics of a type, period, region, or method of construction" shall be further assessed for integrity and context.

The results of the archival research and field assessment shall be documented in an evaluation report. This report shall explicitly state whether the resource is eligible for either state or local historical registers and shall also make specific recommendations for mitigation as appropriate. The historian/architectural historian shall complete the necessary California Department of Parks and Recreation (DPR) site forms (minimally a Primary Record and a Building/Structure/Object Record, with others as required) and include them as an attachment to the report. Copies of the DPR site forms shall be submitted to the CHRIS. Properties found in the evaluation report to meet NRHP criteria A–C or CRHR criteria 1–3 shall be considered "historical resources" as defined in Section 15064.5 of the CEQA regulations. Significant effects on historical resources shall be avoided or mitigated by the lead agency and as recommended by a qualified historian or architectural historian in compliance with the City's adopted Historic Preservation ordinance.

CUL-7: Phase I Pedestrian Survey, Records Search, and Letter Report. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City

ordinance: Prior to future project approvals and the issuance of any construction permits, including but not limited to a grading permit, future projects within the city that have the potential to impact archaeological resources shall obtain a qualified archaeologist and Native American consultant, if applicable, to conduct a pedestrian survey and records search to determine the potential for the project area to contain significant archaeological resources. A qualified archaeologist shall be a registered professional archaeologist and possess an advanced degree in archaeology, history, or a related discipline. The findings from the pedestrian survey and records search shall be included in a brief archaeological letter report. The report shall indicate whether the project area has a low, moderate, or high potential to contain prehistoric and historic archaeological resources. Projects characterized by no known resources and a low potential for unknown archaeological resources shall not involve any additional investigative work nor require any mitigation related to archaeological resources.

CUL-8: Phase II Testing and Evaluation and Data Recovery Plan. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Projects in areas having known resources or a moderate to high potential for significant resources shall undergo test and evaluation to determine if potentially significant archaeological resources are present. A Native American consultant shall be retained for projects involving prehistoric or ethnohistoric resources. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation, or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.

CUL-9: Project Construction Monitoring. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Monitoring during construction grading or trenching may be required if there is a potential for encountering subsurface cultural resources. This requirement would derive from the management recommendations of either the test and evaluation report or the data recovery report discussed in MM CUL-3. When invoked, the project applicant must provide written proof that a qualified archaeologist and a Native American monitor, if applicable, have been retained to observe all earth-disturbing activities. Any unexpected discoveries shall be treated in accordance with MM CUL-8.

CUL-10: Paleontological Monitoring. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.

CUL-11: Inform Construction Crew of Legal Requirements Pertaining to Discovery of Human Remains. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to beginning fieldwork on any new projects, the project applicant and their contractors and subcontractors shall be informed of their legal obligations in the event of the discovery of human remains during excavation or trenching. These obligations derive from the State of California Health and Safety Code Section 7050.5 and PRC 5097.98. The discovery of human remains or presumed human remains requires that the area of the discovery be protected from further disturbance and that an immediate call be made to the County Coroner. If the Coroner determines that the remains are prehistoric, the Coroner, and only the Coroner, is authorized to contact the NAHC. They, in turn, will determine and notify a MLD from the local Native American community. Meaningful consultation between the MLD, qualified archaeologist, project applicant, and the City shall establish a Memorandum of Understanding detailing a reasonable course of action that will reduce adverse impacts to a level less than significant. The Memorandum of Understanding and technical reports from the MLD and the qualified archaeologist shall be submitted and distributed as required.

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

DISCUSSION

BUILDING ENERGY CONSERVATION STANDARDS

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 and are updated every three years (Title 24, Part 6, of the California Code of Regulations). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the CEC adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020. The 2022 Building Energy Efficiency Standards will be adopted during 2021 and will go into effect January 1, 2023.

The 2016 Standards improved upon the 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2016 Standards, residential buildings are 28 percent more energy efficient and nonresidential buildings are five percent more energy efficient than under the 2013 Standards. Buildings that are constructed in accordance with the 2013 Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 Standards due to better windows, insulation, lighting, ventilation systems, and other features.

Under the 2019 Standards (which went into effect on January 1, 2020), residential buildings are expected to be about seven percent more energy efficient compared to the 2016 Standards, and when the required rooftop solar is factored in for low-rise residential construction, residential buildings built to meet the 2019 Standards would use about 53 percent less energy than those built to meet the 2016 Standards. Nonresidential buildings are expected to use about 30 percent less energy due mainly to lighting upgrades.

CALIFORNIA GREEN BUILDING STANDARDS CODE (TITLE 24, PART 11)

The California Green Building Standards Code (CALGreen) is Part 11 of Title 24, California Code of Regulations. CALGreen is the first-in-the-nation mandatory green building standards code, developed in an effort to meet the goals of California's landmark initiative AB 32, which established a comprehensive program of cost-effective reductions of GHG emissions to 1990 levels by 2020. CALGreen includes a waste diversion mandate, which requires that at least 65 percent of construction materials generated during new construction or demolition projects are diverted from landfills.

SENATE BILL 1078

SB 1078 (Chapter 516, Statutes of 2002) establishes a renewable portfolio standard (RPS) for electricity supply. The RPS required that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide 20 percent of their supply from renewable sources by 2017.

SENATE BILL 350

SB 350 was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 100 (discussed below) was signed into law September 2018 and increased the required RPSs.

SENATE BILL 100

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the total kilowatt-hours of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

ENERGY ACTION PLAN

In 2013, the City adopted an Energy Action Plan (EAP) and an update to its General Plan. The EAP focuses on policies involving energy efficiency in existing buildings and construction of high performance new buildings. The EAP was prepared by the San Gabriel Valley Energy Wise Partnership (SGVEWP) between 30 member cities, Southern California Edison (SCE), and Southern California Gas Company. The EAP identifies municipal and community strategies to achieve the city's long-term electricity efficiency goals and has objectives such as creating a long-term vision for energy efficiency; providing and assessing information related to energy use and greenhouse gas (GHG) emissions; establishing reduction targets for energy efficiency; identifying goals, policies, and actions to achieve energy reductions; providing a framework implementing the identified goals, policies, and actions.

a. LESS THAN SIGNIFICANT IMPACT. There is no specific proposed development under the project at this time. Future development proposals consistent with the Housing Element Update would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potentially significant energy impacts. Because the details regarding future development are not known at this time, construction and operational energy use is analyzed qualitatively.

CONSTRUCTION-RELATED ENERGY IMPACTS

Construction activities associated with individual development projects under the Housing Element Update would require the consumption of petroleum fuels (gasoline and diesel fuel) by construction workers travelling to and from the site, transportation of site and building materials, and equipment for on-site construction activities. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities except where electricity is available and feasible, thus electricity use during future construction activities is considered to be minor. Energy usage during future construction activities associated with individual development projects would be temporary in nature and would only utilize the energy required, and would not be wasteful, inefficient, or unnecessary. Furthermore, future demolition and construction activities would be subject to CALGreen, which includes a waste diversion mandate, which requires that at least 65 percent of construction materials generated during new construction or demolition projects are diverted from landfills. Since no specific development projects are proposed at this

time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

OPERATIONAL-RELATED ENERGY IMPACTS

Operational activities associated with individual development projects under the Housing Element Update would require the consumption of petroleum fuels for automobiles, and electricity and natural gas for appliances, heating, cooling, etc. Individual development projects would be required to comply with the *current* Building Energy Efficiency Standards, which are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. For instance, the 2019 Building Energy Efficiency Standards require rooftop solar in construction of new residential units (with some exceptions). Individual development project would also be subject to CALGreen, which addresses a variety of aspects of sustainable building practices involving water and energy conservation. Because individual development projects would be subject to the current Building Energy Efficiency Standards and CALGreen, energy usage during the operation of individual development projects would not be wasteful, inefficient, or unnecessary. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

b. LESS THAN SIGNIFICANT IMPACT. As discussed in Impact a), the Building Energy Efficiency Standards and CALGreen mandate a variety of energy conservation and efficiency standards to be implemented through building design and construction. The city enforces these standards through their local building code, plan check, and permitting procedures. Additionally, electricity supplied to the project by SCE would comply with the State's RPS.

At the local level, the city approved an EAP in 2013, which was prepared by the SGVEWP between 30 member cities, SCE, and Southern California Gas Company. The EAP identifies municipal and community strategies to achieve the city's long-term electricity efficiency goals and has objectives such as creating a long-term vision for energy efficiency; providing and assessing information related to energy use and greenhouse gas (GHG) emissions; establishing reduction targets for energy efficiency; identifying goals, policies, and actions to achieve energy reductions; providing a framework implementing the identified goals, policies, and actions. Therefore, impacts would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

VII. Geology and Soils *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
(iv) Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

DISCUSSION

a1. LESS THAN SIGNIFICANT IMPACT. La Cañada Flintridge is subject to seismic activity from the Sierra Madre Fault zone. Regionally, several active faults are considered capable of affecting property within the city. With many homes constructed prior to the 1930s, the city's housing stock includes unreinforced masonry structures that are particularly vulnerable in an earthquake. The exact number of such structures is not known, and the high quality of construction employed in the City suggests that many pre-1934 masonry structures may actually be reinforced. The city (the 91011 zip code) has not been included within the Earthquake Brace and Bolt program (EBB), which provides grants for seismic retrofitting, for several years. The City is currently working with the state to ensure all homes are eligible for the EBB program. Property owners who do seismic retrofitting voluntarily utilize the City of Los Angeles' standard plans, which minimizes review by Building and Safety and cost and time for applicants. This program is still active, but registration is currently closed.

The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to mitigate the hazard of surface faulting by preventing the construction of buildings used for human occupancy over an area with known faults. Unlike damage from ground shaking, which can occur at great distances from the fault, impacts from fault rupture are limited to the immediate area of the fault zone where the fault breaks along the grounds surface. Damage to existing or future structures from a rupture of the Sierra Madre Fault Zone, which comprises several mapped traces along the south flank of the San Gabriel Mountains at the city's northern edge could occur at any time with or without the project. The HEU does not involve the development of any new structures or construction. The SEU includes goals, policies and plans to promote and enhance public safety and reduce exposures for all hazards including seismic hazards. Therefore, impacts from fault rupture would be expected to be less than significant.

a2 – a4. LESS THAN SIGNIFICANT IMPACT. The project area (City of La Cañada Flintridge), like most of southern California, is subject to strong ground shaking from seismic events. Consequently, people and/or structures could be exposed to seismic ground shaking at any time. The ground motion characteristics of any future earthquakes in the region would depend on the characteristics of the generating fault, the distance to the epicenter, the magnitude of the earthquake, and the site-specific geologic conditions. Major faults in the region could be a source of a strong seismic-related movement at the project site. The closest known seismically active area is Sierra Madre Fault Zone, which comprises several mapped traces along the south flank of the San Gabriel Mountains at the city's northern edge.

Any project site containing a structure has the potential to be affected by seismic activity. LCF is within a seismic active area that has experienced damaging earthquakes in the past. Seismic events can result in soil failure causing damage to structures, creating potential safety hazards to humans.

The City requires geologic and soils reports for many new development applications to assess potential geologic hazards and to determine if these hazards can be adequately mitigated. All projects that include basements and most projects associated with hillside lots require review and approval from the Geologic Materials Engineering (GMED) Division of LA County Public Works. The applicable report would identify if impacts are significant and if special design is required. Compliance with City GP policies SE 1.1.1, SE 1.1.11, SE 1.1.12, SE 1.1.14 would be required for all future land development/construction projects.

Additionally any/all future new housing units would be constructed in compliance with the seismic safety standards set forth in the California Building Code (CBC), as amended.[1] Compliance with the CBC would

1 The CBC incorporates relevant sections of the Uniform Building Code of the International Conference of Building Officials.

include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it would withstand the effects of strong ground shaking. In addition, the City's Building Department would review the building plans through building plan checks, issuance of a building permit, and inspection of the residences during construction, which would ensure that all required CBC seismic safety measures are incorporated into all of the apartments. Compliance with the CBC and the Building Department's review process, permit application, and inspection would result in less than significant impacts, and no mitigation measures are required.

Any/all future construction projects would require a geotechnical analysis/report addressing risks and identifying appropriate geotechnical mitigation for projects proposed within a mapped Seismic Hazard Zone. Recommendations for site-specific geotechnical investigations pursuant to the Seismic Hazards Mapping Act would be adhered to. Compliance with City GP policies SE 1.1.3, SE 1.1.4, SE 1.1.5, SE 1.1.6. and SE 1.1.7 would also be required per the Seismic Hazards Mapping Act.

In accordance with the CBC, seismic structure design requirements will be based on the Seismic Design Category for the proposed structures, which is based on the Occupancy Category for the structure and on the level of expected soil modified seismic ground motion. The final determination of the Seismic Design Category will be made at the time of building plan submittal and review of a site-specific soils report. Future construction plans would be reviewed pursuant to latest edition of the Los Angeles County Building Code and the State Seismic Hazards Mapping Act, if applicable. For any hillside development qualifying as a project as defined by the Seismic Hazards Mapping Act, the City would require preparation of a site-specific geotechnical investigation that includes an evaluation of landslide hazard. Reports shall be prepared by qualified, California-licensed professional personnel (i.e., geotechnical engineer (GE) and certified engineering geologist (CEG) and would be independently peer reviewed by the City or its designee. The City enforces the recommendations of all site-specific geotechnical investigations via the building permit process.

For any new development in range front areas, the City requires a site-specific assessment of risks related to landslide runout. The assessment is required to be performed and reported by qualified, California-licensed professional personnel (GE and CEG as noted above) and would be independently peer reviewed by the City or their designee. The City enforces the recommendations of the report via the building permit process.

As the project does not involve construction or land development, the project would not directly expose people and structures to potential seismic-related ground failure, including liquefaction as no construction or new structures are proposed. Liquefaction is a phenomenon in which a saturated cohesionless soil causes a temporary transformation of the soil to a fluid mass, resulting in a loss of support. Because of the relatively dense/stiff nature of the soil materials and the lack of shallow groundwater, the potential for liquefaction or seismically induced dynamic settlement in the City is considered low. Compliance with the CBC would include the incorporation of seismic safety features to minimize any potential for significant effects as a result of seismic-related ground failure, resulting in less than significant impacts.

b - d. LESS THAN SIGNIFICANT IMPACT. As identified within the City's National Pollution Discharge Elimination System (NPDES) MS4 Permit, Building Code (LACBC), and the California Green Building Standards Code, the recommendations in any soils or geotechnical reports must be followed during grading and site preparation activities for any future development projects arising out of the HEU. All future construction sites would be required to implement Best Management Practices (BMPs) to control erosion, debris, and construction-related pollutants. Compliance with LCFMC Chapter 9.20 Low Impact Development Standards

(http://qcode.us/codes/lacanadaflintridge/), CASQA Construction BMP Online Handbook (www.casqa.org/resources/bmp-handbooks), Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMP) Manual (www.dot.ca.gov/hq/construc/stormwater/manuals.htm) is also required by the City.

With implementation of soils and/or geotechnical recommendations, as well as the required application of standard erosion control measures and storm water construction BMPs, less than significant impacts are anticipated regarding soil erosion or loss of topsoil during any future construction project.

The potential for landslides, lateral spreading, liquefaction, or seismically induced dynamic settlement to occur would be identified in site specific geotechnical evaluations and any/all recommendations would be required. Compliance with the City's adopted Building Code (http://qcode.us/codes/lacanadaflintridge/) and any specific recommendations of any future site-specific geotechnical investigations would be required. With these protocols in place, potential impacts would be less than significant.

Soils with the potential for expansion or compression would be identified be identified in site specific geotechnical evaluations and any/all recommendations would be required to be followed. With these protocols in place, potential impacts would be less than significant. Given the remedial grading requirements and recommendations that the City requires in submittals for a Grading Permit, less than significant impacts would arise from the compressible or expansive soils.

e. Less Than Significant Impact. The proposed project does not involve any construction and any future construction projects for new housing units would tie into existing sewers or existing septic systems or onsite wastewater treatment systems, avoiding the need for new or additional septic tanks or alternative wastewater disposal systems. Any existing septic systems would be removed in the future during the first phase of any future project. Therefore, no impacts would occur.

f. Less Than Significant Impact. The probability of discovering paleontological resources depends on the geologic formation being excavated, and the depth and volume of the excavation. Sedimentary rocks, such as those found in coastal areas, usually contain fossils. Granite rocks, such as those found in inland areas, generally will not contain fossils. While the project would not result in direct housing construction, it would facilitate and provide a policy framework for future housing development throughout the City. Therefore, there is a likelihood that earthwork activities associated with future housing development facilitated by the HEU would encounter a paleontological resource. Direct impacts to paleontological resources could occur when earthwork activities (e.g., grading) cut into sensitive paleontological areas, thereby directly damaging the resource, or exposing paleontological resources to potential indirect impacts (e.g., surficial erosion, uncontrolled specimen collection).

All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to demonstrate consistency with General Plan policies protecting paleontological resources. General Plan Conservation Element Policy requires that sites proposed for future development are to be evaluated by certified archaeologists and/or paleontologists in accordance with CEQA. The General Plan Policy as well as City's development review process may require additional studies if paleontological resources are suspected to be impacted by future development on future candidate housing sites. Compliance with the established regulatory framework would ensure potential impacts from future housing development concerning the destruction of a unique paleontological resource or unique geologic feature would be less than significant.

Per the General Plan EIR, for any future construction projects that implement the HEU, monitoring during construction grading or trenching would be required for any projects that propose to excavate to a depth or

10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. In these instances, a project applicant would be required to provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during monitoring would be required to be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility. With these measures in place impacts to paleontological resources would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

GEO-1: Construction plans to be reviewed and approved pursuant to latest edition of the Los Angeles County Building Code and the State Seismic Hazards Mapping and Alquist-Priolo Earthquake Fault Zones Acts, if applicable.

GEO-2: In accordance with the California Building Code, seismic structure design requirements will be based on the Seismic Design Category for the proposed structures, which is based on the Occupancy Category for the structure and on the level of expected soil modified seismic ground motion. The final determination of the Seismic Design Category will be made at the time of building plan submittal and review of a site-specific soils report.

GEO-3: Construction plans to be reviewed and approved pursuant to latest edition of the Los Angeles County Building Code and the State Seismic Hazards Mapping Act, if applicable.

GEO-4: For any hillside development qualifying as a project as defined by the Seismic Hazards Mapping Act, the City shall require preparation of a site-specific geotechnical investigation that includes an evaluation of landslide hazard. Reports shall be prepared by qualified, California-licensed professional personnel—geotechnical engineer (GE) and certified engineering geologist (EG)—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce recommendations of the site-specific geotechnical investigation via the building permit process and shall be responsible for proper implementation.

GEO-5: For any new development in range front areas, the City shall require a site-specific assessment of risks related to landslide runout. The assessment shall be performed and reported by qualified, California-licensed professional personnel - GE and certified EG - and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce any recommendations of the report via the building permit process and shall be responsible for proper implementation.

GEO-6: All construction sites are required to implement Best Management Practices (BMPs) to control erosion, debris, and construction-related pollutants. Compliance with LCFMC Chapter 9.20 Low Impact Development Standards (http://qcode.us/codes/lacanadaflintridge/), CASQA Construction BMP Online Handbook (www.casqa.org/resources/bmp-handbooks), Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMP) Manual (www.dot.ca.gov/hq/construc/stormwater/manuals.htm)

GEO-7: Obtain approval from LA County Public Health for conventional and non-conventional on-site wastewater treatment system, consistent with the LA County Local Agency Management Program. (http://www.publichealth.lacounty.gov/eh/docs/ep_lu_Lamp.pdf)

GEO-8: Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.

GEO-9: City Earthquake Fault Zoning and Alquist-Priolo Act Requirements for Sierra Madre Fault. The City shall work with staff of the California Geological Survey and/or qualified, state-licensed consultant personnel to: (1) determine if the portion of the Sierra Madre Fault Zone lies within city limits and, if so, (2) adopt as a city ordinance an Earthquake Fault Zone. The provisions of this ordinance shall be consistent with all relevant provisions of the Alquist-Priolo Earthquake Fault Zoning Act. The City shall thereby enforce Alquist-Priolo Act requirements for project proposals involving parcels within the new City-designated Earthquake Fault Zone for the Sierra Madre Fault.

GEO-10: Ridge-Top Shattering Risk Assessment and Mitigation for Hillside Development. The City shall amend its hillside development ordinance to require the mandatory geotechnical reports prepared for all hillside development consistent with General Plan Safety Element Policy 1.1.3 and implementing ordinances to include a site- and project-specific assessment of ridge-top shattering risks. If appropriate in the professional judgment of the geotechnical engineer and/or certified engineering geologist of record, the report shall also identify geotechnical measures to mitigate the hazard to the extent feasible.

GEO-11: Ordinances Implementing General Plan Update Policies Relevant to Landslide Hazards Reduction. The City shall modify its existing Hillside Development Ordinance or establish new ordinances to require the following.

- For any hillside development qualifying as a project as defined by the Seismic Hazards Mapping Act, the City shall require preparation of a site-specific geotechnical investigation that includes an evaluation of landslide hazard. Reports shall be prepared by qualified, California-licensed professional personnel—geotechnical engineer (GE) and certified engineering geologist (EG)—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce recommendations of the site-specific geotechnical investigation via the building permit process and shall be responsible for proper implementation.
- For any new development in rangefront areas, the City shall require a site-specific assessment of risks related to landslide runout. The assessment shall be performed and reported by qualified, California-licensed professional personnel—GE and certified EG—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce any recommendations of the report via the building permit process and shall be responsible for proper implementation.

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

DISCUSSION

BACKGROUND AND GENERAL PRINCIPLES

"Global warming" and "global climate change" are the terms used to describe the increase in the average temperature of the earth's near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal, with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between 2 and 11°F over the next 100 years.

Natural processes and human actions have been identified as the causes of this warming. The International Panel on Climate Change (IPCC) concludes that variations in natural phenomena such as solar radiation and volcanoes produced most of the warming from pre-industrial times to 1950 and had a small cooling effect afterward (IPCC, 2014). After 1950, however, increasing greenhouse gas (GHG) concentrations resulting from human activity such as fossil fuel burning, and deforestation have been responsible for most of the observed temperature increase. These basic conclusions have been endorsed by more than 45 scientific societies and academies of science, including all of the national academies of science of the major industrialized countries. Since 2007, no scientific body of national or international standing has maintained a dissenting opinion.

Increases in GHG concentrations in the earth's atmosphere are thought to be the main cause of human-induced climate change. The IPCC is now 95 percent certain that humans are the main cause of current global warming (IPCC, 2014). GHG naturally trap heat by impeding the exit of solar radiation that has hit the earth and is reflected back into space. Some GHG occur naturally and are necessary for keeping the earth's surface inhabitable. However, increases in the concentrations of these gases in the atmosphere during the last 100 years have decreased the amount of solar radiation that is reflected back into space, intensifying the natural greenhouse effect and resulting in the increase of global average temperature.

Gases that trap heat in the atmosphere are referred to as GHG because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG has been implicated as the driving force for global climate change. The primary GHG are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), ozone, and water vapor.

While the presence of the primary GHG in the atmosphere are naturally occurring, CO_2, CH_4, and N_2O are also emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas methane results

from off-gassing associated with agricultural practices, coal mines, and landfills. Other GHG include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

CO_2 is the reference gas for climate change because it is the predominant GHG emitted. The effect that each of the aforementioned gases can have on global warming is a combination of the mass of their emissions and their global warming potential (GWP). GWP indicates, on a pound-for-pound basis, how much a gas is predicted to contribute to global warming relative to how much warming would be predicted to be caused by the same mass of CO_2. CH_4 and N_2O are substantially more potent GHG than CO_2, with GWP of 28 and 265 times that of CO_2, respectively (IPCC, 2014).

In emissions inventories, GHG emissions are typically reported in terms of pounds or metric tons of CO_2 equivalents (CO_2e). CO_2e are calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH_4 and N_2O have much higher GWP than CO_2, CO_2 is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO_2e.

Fossil fuel combustion, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO_2 emissions (and thus substantial increases in atmospheric concentrations of CO_2). In pre-industrial times (c. 1860), concentrations of atmospheric CO_2 were approximately 280 parts per million (ppm). By December 2020, atmospheric CO_2 concentrations had increased to 414 ppm, 48 percent above pre-industrial concentrations (NOAA, 2021).

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity (CalEPA, 2006).

REGULATORY FRAMEWORK

STATE OF CALIFORNIA

State regulations and standards applicable to the project are listed below.

Solid Waste Sources - The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; (2) diversion of 50 percent of all solid waste on and after January 1, 2000; and (3) diversion of 75 percent of all solid waste on or after 2020, and annually thereafter. The California Department of Resources Recycling and Recovery (CalRecycle) is required to develop strategies, including source reduction, recycling, and composting activities, to achieve the 2020 goal.

CalRecycle published a discussion document, entitled *California's New Goal: 75 Percent Recycling,* which identified concepts that would assist the State in reaching the 75 percent goal by 2020. Subsequently, in August 2015, CalRecycle released the *AB 341 Report to the Legislature*, which identifies five priority strategies for achievement of the 75 percent goal: (1) moving organics out of landfills; (2) expanding recycling/manufacturing infrastructure; (3) exploring new approaches for State and local funding of sustainable waste management programs; (4) promoting State procurement of post-consumer recycled content products; and (5) promoting extended producer responsibility.

California Code of Regulations Title 24 - Although not originally intended to reduce greenhouse gas emissions, Title 24 of the California Code of Regulations, Part 6: California's Energy Efficiency Standards

for Residential and Nonresidential Buildings, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods. Energy efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in GHG emissions. Therefore, increased energy efficiency results in decreased GHG emissions. Accordingly, Title 24 in the CALGreen Building Code is now a part of the statewide strategy for reducing GHG emissions and is the only statewide plan for reduction of GHG emissions that every local agency must adopt in a public hearing by adopting the state building code. Consistent with CALGreen, the state recognized that GHG reductions would be achieved through buildings that exceed minimum energy-efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Compliance with Title 24 of the CALGreen Building Code is thus a vehicle to achieve statewide electricity and natural gas efficiency targets, and lower GHG emissions from waste and water transport sectors. The Title 24 Building Energy Efficiency Standards were updated in 2019 and buildings whose permit application are dated on or after January 1, 2020 must comply with the 2019 Standards.

Pavley Standards - California AB 1493 (Pavley) enacted on July 22, 2002, required the California Air Resources Board (CARB) to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks for model years 2009–2016, which are often times referred to as the "Pavley I" standards. The CARB obtained a waiver from the USEPA that allows for implementation of these regulations notwithstanding possible federal preemption concerns.

Executive Order (EO) S-3-05 - EO S-3-05, signed by Governor Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions below 1990 levels by 2050. EO S-3-05 also calls for the California EPA (CalEPA) to prepare biennial science reports on the potential impact of continued GCC on certain sectors of the California economy. The first of these reports, "Our Changing Climate: Assessing Risks to California," and its supporting document "Scenarios of Climate Change in California: An Overview" were published by the California Climate Change Center in 2006.

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 - In September 2006, Governor Schwarzenegger signed AB 32 into law. AB 32 required that, by January 1, 2008, the California Air Resources Board (CARB) shall determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. The CARB adopted its *AB 32 Scoping Plan* in December 2008, which provided estimates of the 1990 GHG emissions level and identified sectors for the reduction of GHG emissions. In 2011, the CARB developed a *Supplement to the AB 32 Scoping Plan* which updated the emissions inventory based on current projections and included adopted measures such as the Pavley Fuel Efficiency Standards and 20 percent Renewable Portfolio Standard (RPS) requirement.

In 2014, the CARB published its *First Update to the Climate Change Scoping Plan.* This update indicated that the State is on target to meet the goal of reducing GHG emissions to 1990 level by 2020. The *First Update* tracks progress in achieving the goals of AB 32 and lays out a new set of actions that will move the State further along the path to achieving the 2050 goal of reducing emissions to 80 percent below 1990 levels. While the *First Update* discusses setting a mid-term target, the plan does not yet set a quantifiable target toward meeting the 2050 goal.

In January 2017, the CARB released the draft of *the 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (*Second Update*). This update

addresses the statewide emissions reduction target established pursuant to Senate Bill (SB) 32 and Executive Order B-30-15, as discussed below. The major elements of the *Second Update*, as proposed in the CARB's January 2017 draft, include (but are not limited to) achieving the following milestones by 2030: a 50 percent Renewable Portfolio Standard (discussed below); a more stringent Low Carbon Fuel Standard (discussed below) that requires an 18 percent reduction in carbon intensity; deploying additional near-zero and zero emissions technologies in the transportation sectors; increasing the stringency of the SB 375 (discussed below) reduction targets for 2035; a 20 percent reduction in GHG emissions from the refinery sector; and, continued deployment of a declining emissions cap under the Cap-and-Trade Program.

Senate Bill (SB) 97 - SB 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. SB 97 directed the Governor's Office of Planning and Research (OPR) to develop draft CEQA guidelines "for the mitigation of greenhouse gas emissions or the effects of OPR published a technical advisory on CEQA and climate change on June 19, 2008. The guidance did not include a suggested threshold but stated that the OPR had asked the CARB to "recommend a method for setting thresholds which will encourage consistency and uniformity in the CEQA analysis of greenhouse gas emissions throughout the state."

The OPR technical advisory does recommend that CEQA analyses include the following components:

- Identification of greenhouse gas emissions;
- Determination of significance; and
- Mitigation of impacts, as needed and as feasible.

On December 31, 2009, the California Natural Resources Agency adopted the proposed amendments to the State CEQA Guidelines. These amendments became effective on March 18, 2010.

SB 375 – The Sustainable Communities and Climate Protection Act of 2008 (SB 375) finds that GHGs from autos and light trucks can be substantially reduced by new vehicle technology, but even so "it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." Therefore, SB 375 requires that regions with metropolitan planning organizations adopt sustainable communities' strategies, as part of their regional transportation plans, which are designed to achieve certain goals for the reduction of GHG emissions from mobile sources.

SB 375 also includes CEQA streamlining provisions for "transit priority projects" that are consistent with an adopted sustainable communities' strategy. As defined in SB 375, a "transit priority project" shall: (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a maximum net density of at least 20 dwelling units per acre; and (3) be within 0.5 mile of a major transit stop or high quality transit corridor.

Low Carbon Fuel Standard - Executive Order S-1-07 requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by the CARB by 2020. In 2009, the CARB approved the Low Carbon Fuel Standard regulations, which became fully effective in April 2010. The regulations were subsequently re-adopted in September 2015 in response to related litigation.

Advanced Clean Cars Program - In 2012, the ARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2017–2025. (This program is sometimes referred to as "Pavley II.") The program combines the control of smog, soot, and GHGs with requirements for greater numbers of

zero-emission vehicles. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs.

Zero Emission Vehicles - Zero emission vehicles (ZEVs) include plug-in electric vehicles, such as battery electric vehicles and plug-in hybrid electric vehicles, and hydrogen fuel cell electric vehicles. In 2012, Governor Brown issued Executive Order B-16-2012, which calls for the increased penetration of ZEVs into California's vehicle fleet in order to help California achieve a reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels by 2050. In addition, the Executive Order also requires the California Public Utilities Commission to establish benchmarks that will: (1) allow over 1.5 million ZEVs to be on California roadways by 2025, and (2) provide the State's residents with easy access to ZEV infrastructure. CALGreen requires new residential construction to be pre-wired to facilitate the future installation and use of electric vehicle chargers (Section 4.106.4 of 2019 CALGreen Standards).

EO B-30-15 - In April 2015, Governor Brown signed Executive Order B-30-15, which established the following GHG emission reduction goal for California: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This Executive Order also directed all state agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05.

Senate Bill 32 and Assembly Bill 197 - Enacted in 2016, SB 32 codifies the 2030 emissions reduction goal of Executive Order B-30-15 by requiring the ARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. SB 32 was coupled with a companion bill: AB 197. Designed to improve the transparency of the CARB's regulatory and policy-oriented processes, AB 197 created the Joint Legislative Committee on Climate Change Policies, a committee with the responsibility to ascertain facts and make recommendations to the Legislature concerning statewide programs, policies and investments related to climate change. AB 197 also requires the ARB to make certain GHG emissions inventory data publicly available on its web site; consider the social costs of GHG emissions when adopting rules and regulations designed to achieve GHG emission reductions; and include specified information in all Scoping Plan updates for the emission reduction measures contained therein.

Climate Action Plan - The city's Climate Action Plan (CAP) was adopted on June 21, 2016. The CAP targets include a 15 percent reduction below 2007 levels by 2020 and a 58 percent reduction below 2007 levels by 2035. The trajectory set aims for the City to exceed the 2030 target (175,309 metric tons CO_2e) by approximately 6 percent (164,595 metric tons CO_2e). The City is expected to meet the 2020 target (awaiting a 2020 citywide emissions inventory to confirm) and is showing substantial progress towards meeting the 2035 target. The city's CAP is considered a Qualified Greenhouse Gas Plan under CEQA.

a - b. LESS THAN SIGNIFICANT IMPACT. The city's CAP targets include a 15 percent reduction below 2007 levels by 2020 and a 58 percent reduction below 2007 levels by 2035. The trajectory set aims for the City to exceed the 2030 target (175,309 metric tons CO_2e) by approximately 6 percent (164,595 metric tons CO_2e). The City is expected to meet the 2020 target (awaiting a 2020 citywide emissions inventory to confirm) and is showing substantial progress towards meeting the 2035 target. Therefore, the City has shown consistency with SB 32 and the CAP is considered a Qualified Greenhouse Gas Plan under CEQA. For a project located within a jurisdiction that has adopted a qualified GHG reduction plan (as defined by CEQA Guidelines Section 15183.5), GHG emissions would be less than significant if the project is anticipated by the plan and fully consistent with the plan.

Construction and operational activities associated with individual development projects under the Housing Element Update would generate an increase in GHG emissions. Subsequent environmental review of future development projects would be required to assess consistency with the city's CAP. Individual projects

would be required to comply with the current Building Energy Efficiency Standards and CALGreen, which would reduce GHG emissions through energy efficiency and renewable energy. Operational GHG emissions would decrease over time through the State's RPS, LCFS, Advanced Clean Cars Program and increases in ZEVs. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, the project would not result in a cumulatively considerable global climate change impact and this impact would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

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

DISCUSSION

a - c. LESS THAN SIGNIFICANT IMPACT. The project would not result in direct housing construction but would facilitate and provide a policy framework to accommodate future housing needs in the City as calculated by HCD and SCAG. As noted in above, the future housing development facilitated by the HEU would result in a population growth of 1,928 (612 units x 3.15 persons per household) if all occupants of the RHNA units were to move to the City from elsewhere.

Exposure of the public or the environment to hazardous materials can occur through transportation accidents; environmentally unsound disposal methods; improper handling of hazardous materials or hazardous wastes (particularly by untrained personnel); and/or emergencies, such as explosions or fires. The severity of these potential effects varies by type of activity, concentration and/or type of hazardous materials or wastes, and proximity to sensitive receptors.

The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development throughout the City. Demolition and construction activities associated with future housing development facilitated by the HEU would require transport of hazardous materials (e.g., asbestos containing materials, lead-based paint, and/or contaminated soils). This transport would be limited in duration. Compliance with handling measures is required by the City, County's Department of Environmental Health, and the South Coast Air Quality Management District during construction and operational phases of future development projects. These measures include standards and regulations regarding the storage, handling, and use of hazardous materials.

Future housing development facilitated by the HEU would not involve ongoing or routine use of substantial quantities of hazardous materials during operations (occupancy of future housing). Only small quantities of hazardous materials would be anticipated including cleaning solvents, fertilizers, pesticides, and other materials used in regular maintenance. On the local level, the County Fire Department routinely provides inspections to ensure the safe storage, management, and disposal of any hazardous materials in accordance with the federal, state, and local regulations. Impacts associated with the transport, use, or disposal of hazardous materials would be less than significant.

Based on the age of the buildings on any given future identified land development site, asbestos-containing materials (ACM) and lead based paints (LBP) may be present inside or outside the buildings. For these redevelopment sites, or on sites where demolition is required, prior to any site disturbing activities, the City would require than the Applicant and/or Owner conduct testing for the presence of ACM and LBP. If the testing determines that ACM and/or LBP are present on-site, removal of these potential hazardous building materials shall occur in accordance with all regulatory procedures prior to on-site demolition activities. Any materials exported from the site must be properly managed and transported to an appropriately permitted facility if it is characterized as a regulated or hazardous waste.

Future construction projects located within one-quarter mile of an existing or proposed school that emit hazardous emissions or handle hazardous materials would be required to prepare a special study to determine the potential health impacts on school children, teachers, and faculty.

For any projects involving site disturbing activities, the Applicant and/or Owner would be required to prepare a soil management plan to the satisfaction of the City. The goal of this soil management plan is to prevent exposure to contaminated soils on-site during excavation, grading, and septic tank removal. The soil management plan shall delineate the horizontal and lateral limits of any soils containing detectable concentrations of organochlorine pesticides at concentrations exceeding the Regional Water Quality Control Board (RWQCB) Tier1 SSL, since any reported concentrations of constituents of concern besides metals would be considered a regulated waste. Any soil exported from the site must be properly managed and transported to an appropriately permitted facility if it is characterized as a regulated or hazardous waste.

Typically, residential uses do not generate, store, dispose of, or transport quantities of hazardous substances. Likewise, construction equipment that would be used to build the proposed project also has the potential to release relatively small amounts of oils, greases, solvents, and other finishing materials through accidental spills. While the release of any of these materials could have the potential to impact

surrounding land uses, a release of a significant amount of these hazardous substances is not likely due to the relatively small amount of material that would be stored or used on-site.

Nevertheless, federal, State, and local regulations would be in effect to reduce the effects of such potential hazardous materials spills. In addition, the City enforces State, and federal hazardous materials regulations through plan check review. The City Uniform Fire Code (Chapter 4.01 of the Municipal Code) adopts the State of California's Fire Code, which includes regulations concerning hazardous materials spill mitigation, and containment and securing of hazardous materials containers to prevent spills. In addition, the State Fire Marshal enforces oil and gas pipeline safety regulations, and the federal government enforces hazardous materials transport pursuant to its interstate commerce regulation authority. Compliance with all of these requirements is mandatory as standard permitting conditions during plan reviews and inspections of completed projects and would minimize the potential for the accidental release or upset of the noted hazardous materials, thus ensuring public safety. Therefore, impacts would be less than significant.

d – e. LESS THAN SIGNIFICANT IMPACT. For any future land development projects arising out of the HEU implementation, federal, State and local environmental databases will be required to be reviewed by Environmental Data Resources Inc. for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances, including the Cortese List database.

No portion of the City is located within an airport land use plan or within two miles of a public or private use airport. Therefore, implementation of the proposed project would not result in an airport safety hazard for people in the City.

f – g. LESS THAN SIGNIFICANT IMPACT. The Safety Element of the General Plan was updated concurrently with the Housing Element. Since the entire city is in the Very High Fire Hazard Severity Zone, the primary focus was on multiple aspects of fire safety. Properties located in these designated zones are subject to more stringent building code and vegetation management requirements than properties outside of these zones. Data from the wildfirerisk.org website published by the USDA Forest Service indicates that populated areas in La Cañada Flintridge have, on average, greater wildfire likelihood than 85% of all the communities in Los Angeles County.

The updated Safety Element includes more stringent policies to: ensure development review requires the use of current fire safe design methods; improve emergency evacuation procedures; enhanced education and communication of fire-related safety and mitigation practices; and ensure accessibility for emergency vehicles.

In some situations, the implementation of these environmentally sound protection measures may reduce the total number of new housing units that can be developed from the number that would be developed in a non-hillside area. However, it is recognized that such protection is necessary for long-term stability and safety. The project does not have the potential to impede planned evacuation routes along Foothill Boulevard, Verdugo Boulevard or the I-210 Freeway or along residential collector streets or hillside streets (accessed by lot(s) subject to the City's Hillside Development Ordinance.

Temporary construction activities and equipment, including but not limited to earth removal, construction vehicles, or construction deliveries, which could block or allow less than 20-feet of paved roadway width or allow insufficient vehicle turning areas for the LA County Fire Department or other emergency vehicles would not be allowed.

All future land development projects would be required to provide for on-street parking that provides more than 20-feet clear pavement width or insufficient vehicle turning areas for the LA County Fire Department or other emergency vehicles.

All future projects would be developed consistent with all Building, Residential and Fire Codes requirements for the "Very High Fire Hazard Severity Zone" (VHFHSZ) and wildland-urban interface and would be required to comply with LA County Fuel Modification Guidelines if the site is identified on adopted maps.

Future discretionary permit applications would be reviewed by the City for compliance the requirements of the City of La Cañada Flintridge Building and Safety Division, the Los Angeles County Department of Public Health Department, and the State Department of Toxic Substances Control. Projects would also be reviewed by the LA County Fire Department in accordance with the latest adopted LA County Building and Fire Code requirements, including the provision of fire sprinklers, upgraded fire apparatus access and fire hydrants, as determined necessary on a project by project or site specific basis for future projects. Projects identified as being subject to LA County Fire Department Fuel Modification requirements will be required to provide a Fuel Modification plan to the City prior to the issuance of a building permit and maintain landscaping in accordance with the approved plan.

The project is proposing to prohibit accessory dwelling units and junior accessory dwelling units in the 12 neighborhoods with evacuation-related safety issues in an effort to avoid increasing development intensity and population at risk. The proposed project would not impair or physically impact any adopted emergency response plan or evacuation plan and in fact the primary goal of the SEU is to promote and enhance public safety in the City. The proposed project would not require the closure of any public or private streets or roadways and would not impede access of emergency vehicles to the project site or any surrounding areas.

The project has been reviewed by the LCFFD, Los Angeles County Fire Department, CalFire and OES, and it would provide all required emergency access in accordance with the requirements of these agencies. Therefore, significant impacts to emergency response would not be anticipated to occur.

The entirety of the City is currently located within a VHFHSZ; therefore, all future development/construction projects would be subject to defensible space requirements of the California Fire Code and the building construction requirements of the Fire Code. Accordingly, no significant increase in risk of loss, injury or death would arise from adoption of the updated HEU and SEU.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

HAZ-1: Mitigation measures would be developed consistent with the requirements of the City of La Cañada Flintridge Building and Safety Division, the Los Angeles County Department of Public Health Department, and the State Department of Toxic Substances Control, where appropriate.

HAZ-2: Projects shall be reviewed and approved by the LA County Fire Department in accordance with the latest adopted LA County Building and Fire Code requirements, including the provision of fire sprinklers, upgraded fire apparatus access and fire hydrants, as determined necessary for the project.

HAZ-3: Projects identified as being subject to LA County Fire Department Fuel Modification requirements shall provide an approved Fuel Modification plan to the City prior to the issuance of a building permit and maintain landscaping in accordance with the approved plan.

HAZ-4: Phase I, Phase II, or Phase III Environmental Site Assessment Prior to Development of Sites Related to the Use, Transport, or Storage of Hazardous Materials Sites. Prior to the issuance of any grading permits for any future project under the General Plan Update that would take place on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), or on a site that was previously occupied by a land use that used or generated hazardous materials or wastes, the project applicant shall complete a Phase I, II, or III Environmental Site Assessment (ESA), prepared by a Registered Environmental Assessor (REA). Any recommendations for remediation or further analysis, such as a Phase II or Phase III ESA, shall be implemented prior to issuance of any grading permit. If monitoring during construction is recommended, the project applicant shall provide a letter of verification to the Community Development Director, stating that an REA has been retained to implement the monitoring program during construction activities. The program shall detail the pollutants or evidence of pollutants whose presence is being monitored, as well as the actions to be taken should any pollutant or evidence of pollutant be uncovered. If such a pollutant or evidence of the pollutant is encountered during construction activities (e.g., grading, clearing, or demolition activities), it should be evaluated by an REA and handled in accordance with applicable environmental laws and regulations.

1. A Phase I ESA is required for the development or redevelopment of a property suspected of historically containing hazardous materials and shall include, but not be limited to the following:
    - A comprehensive records search.
    - Consideration of historical information.
    - Onsite evidence of hazardous material use, storage, or disposal.
    - A recommendation as to whether a Phase II soil testing and chemical analysis is required.
2. If the results of the Phase I ESA conclude that a Phase II ESA is necessary, the Phase II ESA shall include, but not be limited to, the following:
    - A work plan that includes the number and locations of proposed soil/monitoring wells, sampling intervals, drilling and sampling methods, analytical methods, sampling rationale, site geohydrology, field screening methods, quality control/quality assurance, and reporting methods. Where appropriate, the work plan is approved by a regulatory agency such as the DTSC, RWQCB, or County HMD.
    - A site-specific health and safety plan signed by a Certified Industrial Hygienist.
    - Necessary permits for encroachment, boring completion, and well installation.
    - A sampling program (fieldwork) in accordance with the work plan and health and safety plan. Fieldwork is completed under the supervision of a State of California registered geologist.
    - Hazardous materials testing through a State-certified laboratory.
    - Documentation, including a description of filed procedures, boring logs/well construction diagrams, tabulations of analytical results, cross-sections, an evaluation of

the levels and extent of contaminants found, and conclusions and recommendations regarding the environmental condition of the site and the need for further assessment. A remedial action plan will be developed as determined necessary by the Principal Investigator. Contaminated groundwater will generally be handled through the NPDES/dewatering process.

- A disposal process, including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat the identified type of waste.

3. If hazardous materials are determined to be present, a Phase III ESA shall be prepared and the responsible party shall contact the local CUPA or applicable regulatory agency to oversee the remediation of the property in compliance with all applicable local, county, state, and federal laws. The property owner, developer, or responsible party shall be responsible for funding or securing funding for the site remediation and shall provide proof to the City that the site contaminants have been properly removed in compliance with all applicable laws and regulations prior to project development.

HAZ-5: Notification of Property Owners. All property owners shall be noticed when purchasing or building a home in the WUI area that they have accepted that the areas have certain risks that make their property, homes, and safety susceptible to wildfires.

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

DISCUSSION

a - e. LESS THAN SIGNIFICANT IMPACT. The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development to meet the local housing need in the City.

As a hillside community, La Cañada Flintridge is subject to landslides, increased likelihood of firestorms, and seasonal mudflows. However, several precautionary actions have been taken to protect hillside areas and downstream water quality, including the establishment of a series of fire roads on open hillside areas, drainage debris basins, and flood control structures. The City regulates the number and degree of manmade cuts and fills through its Hillside Development Ordinance for all properties that have an average slope of 15 percent or greater. Site grading and building design are primary concerns of the City and new development must meet stringent requirements for geologic and soils stability. As part of the comprehensive update to the Zoning Code, the City is adding a chapter that specifically addresses site grading to enhance the safety precautions.

Future residential development in the city will be focused primarily along the Foothill Boulevard corridor, either in the Downtown or in multifamily and mixed use areas, and on a portion of Verdugo Boulevard at SR-2. These sites are located outside of the hillside areas and therefore not subject to landslides or mudflows associated with hillside developments.

According to the City's Local Hazard Mitigation Plan, only 0.21 square mile of La Cañada Flintridge either has not had a flood risk assessed or is located within in a 500-year flood risk area. This equates to approximately 2.5 percent of the area within the city, which means that little land is constrained by potential flooding concerns.

Future housing construction could result in potential impacts related to water quality over three different periods:

- During the earthwork and construction phase, where the potential for erosion, siltation, and sedimentation would be the greatest;
- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly but those associated with urban runoff would increase.

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean.

Short-term impacts related to water quality can occur during the earthwork and construction phases of future housing development projects. During this phase, the potential for erosion, siltation, and sedimentation would be the greatest. Additionally, impacts could occur prior to the establishment of ground cover when the erosion potential may remain relatively high. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and compliance with the established regulatory framework pertaining to water quality.

If future developments disturb more than one acre of land surface, they would be required to obtain coverage under the National Pollution Discharge Elimination System (NPDES) storm water program. The NPDES Construction General Permit program calls for the implementation of best management practices (BMPs) to reduce or prevent pollutant discharge from these activities to the Maximum Extent Practicable for urban runoff and meeting the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology standards for construction storm water. Construction activities would be required to comply with a project-specific Stormwater Pollution Prevention Program (SWPPP) that identifies erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction Activity General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it

has been mobilized. Additionally, the future development projects facilitated by the HEU would be required to comply with LCFMC Chapter 9.21 Stormwater Management ordinance or compliance with the City's NPDES MS4 Permit.

All new development would also be required to incorporate LID practices into their stormwater drainage plans. The incorporation of LID practices would include the following measures from CNE 1.2.2: (a) minimizing pollutant loading and changes in hydrology; (b) ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; (c) minimizing the amount of stormwater guided to impermeable surfaces; (d) maximizing percolation of stormwater into the ground where appropriate; (e) preserving wetlands, riparian corridors, and buffer zones; (f) establishing reasonable limits on the clearing of vegetation from a project site; and (g) requiring incorporation of structural and non-structural best management practices to mitigate projected increases in pollutant loads and flows to ensure that, during a wet weather event, all stormwater remains on site. The incorporation of BMPs such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens will minimize impacts on the groundwater basins by allowing stormwater to percolate into the groundwater basins.

All future development in the City would be subject to the issuance of a grading or building permit to prepare an Urban Storm Water Management Plan (USWMP). Implementation of the USWMP would require peak stormwater runoff rates from new development to not exceed predevelopment levels.

Future land development projects would be required to be consistent with the Los Angeles Regional Water Quality Control Plan https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/

CONSTRUCTION ACTIVITIES

Short-term erosion impacts during the construction phase of the project would be prevented through implementation of an erosion control plan. The erosion control plan would include construction BMPs such as:

- Silt Fence, Fiber Rolls, or Gravel Bag
- Street Sweeping and Vacuuming
- Storm Drain Inlet Protection
- Stabilized Construction Entrance/Exit
- Vehicle and Equipment Maintenance, Cleaning, and Fueling
- Hydroseeding
- Material Delivery and Storage
- Stockpile Management
- Spill Prevention and Control
- Solid Waste Management
- Concrete Waste Management

OPERATIONS

Due to the built-out nature of the City, most surface flows are directed toward existing stormwater drainage facilities. The project would not result in direct housing construction, but would facilitate future housing development and enhanced public safety throughout the City. All candidate housing sites, except those on vacant sites, are developed and, therefore, future development would not create substantial amounts of impervious surfaces that would substantially increase off-site runoff.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, to install, implement, and maintain the BMPs identified in LCFMC §9.21 including, but not limited to erosion management; materials storage; inspection, maintenance, repair, upgrade of BMPs; and preparation of SWPPP. Additionally, future developments would be required to comply with the City's requirements pertaining to Residential BMP requirements including minimum BMPs specified for landscaping, home care and maintenance, and motor vehicle maintenance.

All new development would also be required to comply with existing water quality standards and waste discharge regulations set forth by the State Water Quality Control Board (SWQCB). Future developments facilitated by the HEU would comply with these regulations and waste discharges would be connected to the public wastewater system.

Future housing development facilitated by the HEU would be required to adhere to all federal, state, and local requirements for avoiding violation of water quality standards during construction and operations. Considering these requirements, future housing development facilitated by the HEU would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant.

TYPES OF POST-CONSTRUCTION BMPS

LID Site Design BMPs are intended to minimize impervious surfaces and promote infiltration and evaporation of runoff before it can leave the location of origination by mimicking the natural hydrologic function of the site. Integrated Management Practices (IMPs) facilities are used in conjunction with LID BMPs as they provide small-scale treatment, retention, and/or detention that are integrated into site layout, landscaping and drainage design. Source Control BMPs are intended to minimize, to the maximum extent practicable, the introduction of pollutants and conditions of concern that may result in significant impacts generated from site runoff to off-site drain systems. Treatment Control BMPs are intended to treat storm water runoff before it discharges off-site. Specific localized treatment control BMPs are more effective at reducing or minimizing pollutants of concern than other types of BMPs. Each type of BMP that could be implemented in future site specific construction projects is shown in Table HWQ-1, below.

TABLE HWQ-1 EXAMPLE BMPS

Type of BMP	Description of BMP
LID Site Design	**Minimize Impervious Areas**: Installation of permeable pavers and installation of landscaping.
	Runoff Collection: Biorention facilities could be proposed onsite.
	Landscaping with Native or Drought Tolerant Species: Projects can be landscaped with native and drought tolerant plant species.
	Minimize Soil Compaction: Areas of bioretention will minimize soil compaction.
	Impervious Area Dispersion: Impervious areas to drain to pervious areas before leaving the site.
Source Control	**Landscape/Outdoor Pesticide Use:** Landscape/outdoor pesticides to be applied per local requirements.
	Prevent Illicit Discharges: Storm drain stenciling, or signage can be provided that prohibits illicit discharge to on-site storm drain inlets and structural BMPs. All sewer lines to be connected to the separate sanitary sewer system.
	Storm Drain Stenciling or Signage: Storm drain stenciling, or signage will be provided at each storm drain inlet, and at each inlet to the structural BMPs.

Type of BMP	Description of BMP
	Protect Trash Storage Areas from Rainfall, Run-On, Runoff, and Wind Dispersal: Trash storage areas can be covered to provide protection from rainfall. Trash storage areas to be graded and surrounded by curb or wall to prevent run-on, run-off, and wind dispersal.
	Need for future indoor & structural pest control: Indoor and structural pest control to be provided per local requirements.
	Plazas, Sidewalks and Parking lots: Patios, sidewalks, and parking areas to be swept and kept free of trash and debris.
	Additional BMPs Based on Potential Sources of Runoff Pollutants: Biofiltration; parking garages to be disconnected by pervious areas. Professional pest control company to manage pest control needs. Fire sprinkler test water will flow into landscaped areas.
Treatment Control	**Biofiltration Basin with Hydromodification Capacity:** Stormwater from rooftops to drain into small bioretention areas.

The goal of these measures is to ensure storm water is released in a controlled manner with adequate erosion control protection to the downstream reach. Proposed future development would be required to be designed to not substantially alter existing drainage patterns in a manner which would increase erosion or siltation onsite or offsite. No streams or rivers would be allowed to be altered or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on the site or offsite.

FLOOD HAZARD, TSUNAMI AND SEICHE IMPACTS

The City is not within a 100-year flood hazard zone, tsunami, or seiche zone. Consequently, significant impacts would not occur.

WATER QUALITY CONTROL PLAN AND GROUNDWATER MANAGEMENT PLAN IMPACTS

The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development and important public safety goals policies and programs throughout the City. Consequently, significant impacts to groundwater resources are not anticipated with the proposed project.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

HYD-1: Comply with the City's Stormwater Management ordinance (LCFMC Chapter 9.21) by preparing an Urban Stormwater Mitigation Plan (USWMP), which requires peak stormwater runoff rates from new development to not exceed predevelopment levels.

HYD-2: All new developments shall be required to incorporate LID practices into their stormwater drainage plans. The incorporation of LID practices would include the following measures from CNE 1.2.2: (a) minimizing pollutant loading and changes in hydrology; (b) ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; (c) minimizing the amount of stormwater guided to impermeable surfaces; (d) maximizing percolation of stormwater into the ground where appropriate; (e) preserving wetlands, riparian corridors, and buffer zones; (f) establishing reasonable limits on the clearing of vegetation from a project site; and (g) requiring incorporation of structural and non-structural best management practices to mitigate projected increases in pollutant loads and flows to

ensure that, during a wet weather event, all stormwater remains on site. The incorporation of BMPs such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens will minimize impacts on the groundwater basins by allowing stormwater to percolate into the groundwater basins.

HYD-3: Implementation of all applicable and relevant BMP's.

HYD-4: All developments subject requiring the issuance of a grading or building permit to prepare an Urban Storm Water Management Plan (USWMP). Implementation of the USWMP would require peak stormwater runoff rates from new development to not exceed predevelopment levels.

HYD-5: Low Impact Development (LID) Practices. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: All new developments shall be required to incorporate LID practices into their stormwater drainage plans. The incorporation of LID practices would include the following measures from CNE 1.2.2: (a) minimizing pollutant loading and changes in hydrology; (b) ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; (c) minimizing the amount of stormwater guided to impermeable surfaces; (d) maximizing percolation of stormwater into the ground where appropriate; (e) preserving wetlands, riparian corridors, and buffer zones; (f) establishing reasonable limits on the clearing of vegetation from a project site; and (g) requiring incorporation of structural and non-structural best management practices to mitigate projected increases in pollutant loads and flows to ensure that, during a wet weather event, all stormwater remains on site. The incorporation of BMPs such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens will minimize impacts on the groundwater basins by allowing stormwater to percolate into the groundwater basins.

HYD-6: Sanitary Sewer Line. The City shall require that prior to issuance of permits for the development of existing vacant lands designated for residential and mixed-use uses, the City shall confirm that a wastewater treatment facility will treat the wastewater generated by the new development and that the new development will be connected to that facility.

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

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. Projects that divide an established community can involve large scale linear infrastructure projects, such as freeways, highways, and drainage facilities that bisect an established community or create barriers to movement within that community. "Locally undesirable land uses" such as prisons or landfills sited within economically depressed areas can also divide an established community. The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development and increased public safety throughout the City.

All future housing development facilitated by the HEU would occur in existing residential areas, thus, would not divide an established community. In some areas, residential uses would be required to be part of a mixed-use project in order to comply with zoning where both commercial and residential land uses are allowed. It is not anticipated that future housing development facilitated by the HEU would require substantial road-widenings or other features which could divide the established community. Further, the increase in housing availability within the City facilitated by the HEU would be consistent with City goals to accommodate the RHNA and complement the community as a whole by providing additional housing opportunities for a wide range of income levels over the next eight years (2021 – 2029). Candidate housing sites have been identified throughout the City, rather than concentrated in a single area, thus would not divide an established community. Therefore, a less than significant impact would occur.

b. LESS THAN SIGNIFICANT IMPACT. The 6th Cycle HEU does not propose any development or entitle any construction projects, including ADU's. Future related projects would be subject to the City's development permit review, plan check process. The HEU includes 96 candidate housing opportunity sites for future housing development to meet the City's RHNA allocation of 612 DU. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU, which would occur as market conditions allow and at the discretion of the individual property owners. However, the HEU would identify a series of implementing actions to increase the City's housing capacity incrementally over the long term. As part of the HEU, additional housing units would be accommodated on the candidate housing opportunity sites that are ultimately selected through revisions to the City's Housing Element. Future housing development facilitated by the HEU is anticipated to increase the City's housing stock where capacity exists.

Future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to comply with applicable federal, state, and local

laws and local policies and regulations, as applicable to new housing development. The HEU is subject to comply with applicable State Housing law. As such, the HEU would be consistent with applicable land use and planning policies in the state, regional, and local context as necessary to meet that legislation. This includes consistency with the General Plan. Future housing development facilitated by the HEU would therefore be consistent with all applicable land use and planning policies and regulations intended to minimize environmental effects.

Any conflict with identified plans could be considered a potentially significant impact. Plans include SCAQMD air quality plans and the SCAG Regional Transportation Plan/Sustainable Communities Plan. As noted in Sections III, Air Quality of this IS, implementation of the proposed project would be consistent with SCAQMD air quality plans.

An analysis of the project's consistency with the main goals of the SCAG RTP/SCS is provided in Table LU-1 below. As shown below, the project is consistent with all applicable plans and as a result, significant impacts would not occur.

TABLE LU-1 CONSISTENCY WITH SCAG CONNECT SOCAL GOALS

Goal	Analysis
Goal #1: Encourage regional economic prosperity and global competitiveness	Consistent: The project provides a wide range of housing opportunities for all income levels and is intended to promote a balance of jobs and housing, reduce vehicle miles traveled (VMT) by allowing more people to work closer to home or provide additional housing opportunities in the community in which they work to accommodate anticipated future local and regional growth.
Goal #2: Improve mobility, accessibility, reliability and travel safety for people and goods	Consistent: The addition of 612 (plus identified surplus / buffer units) new RHNA residential units within an existing developed and built out community necessarily means that housing and population density will increase over the eight year planning horizon for the HEU if the units are constructed. The SEU also promotes safety by establishing new goals, policies and plans to ensure public safety in the community.
Goal #3: Enhance the preservation, security, and resilience of the regional transportation system	Consistent: Locating new housing opportunity sites within and along existing established transportation corridors that serve both the City and the Region is intended to support a reduction in VMT and increase and optimize utilization of the existing regional transportation network.
Goal #4: Increase person and goods movement and travel choices within the transportation system	Consistent: The project would locate new housing opportunity sites, within a City that is largely built out, and along existing established transportation corridors serves to promote a reduction in VMT by increasing pedestrian orientation and walkability within close proximity to the downtown and existing commercial centers thereby increasing travel choices of residents.
Goal #5: Reduce greenhouse gas emissions and improve air quality	Consistent: The project would locate new housing opportunity sites, within a City that is largely built out, and along existing established transportation corridors serves to promote a reduction in VMT by increasing pedestrian orientation and walkability within close proximity to the downtown and existing commercial centers. Reductions in VMT translates results in fewer vehicle emissions and cleaner air locally and for the region.
Goal #6: Support healthy and equitable communities	Consistent: Increasing residential intensities and unit availability for all income levels, in the developed downtown commercial area of the City promotes pedestrian activity and less reliance on personal vehicles.

Goal	Analysis
Goal #7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	Consistent: Increasing residential intensities in an urbanized community promotes VMT reductions which in turn supports environmental goals defined in the City's CAP to reduce climate change effects in the City.
Goal #8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	This goal is not directly applicable or relevant to the City's HEU.
Goal #9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	Consistent: The project provides additional housing choices for all income categories in a wide range of housing options along local and regional transportation corridors.
Goal #10: Promote conservation of natural and agricultural lands and restoration of habitats	Consistent: The project relies on existing developed sites and increases housing opportunities in a built out community without any effect on natural lands or native habitats. There is no agricultural land in the City.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

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

DISCUSSION

a - b. NO IMPACT. The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development throughout the City. There are no known mineral resources identified within the California Department of Conservation, "Updated Designation of Regionally Significant Aggregate Resources in the San Gabriel Valley Production-Consumption Region, Los Angeles County," April 2014. In addition, the GP 2030 (adopted 2013) does not identify any areas in the City as locally important mineral resource recovery sites. As a result, implementation of the proposed project would not result in the loss of availability of a regionally or locally known mineral resource; therefore, no impacts would occur.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

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

DISCUSSION

NOISE DESCRIPTORS

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. All references to dB in this analysis will be A-weighted unless noted otherwise. Time-averaged noise levels are expressed by the symbol Leq, with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dB weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dB weighting. This is similar to the Day Night sound level (L_{dn}), which is a 24-hour average with an added 10 dB weighting on the same nighttime hours but no added weighting on the evening hours. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

REGULATORY FRAMEWORK

City of La Canada Flintridge Municipal Code

Construction within the city is regulated under the Municipal Code Section 5.02 (Regulation of Community Noise). Section 5.02.110 (Temporary Construction Activities) establishes construction noise standards based on "noise zones," stating that where technically and economically feasible temporary construction activity shall be conducted in such a manner that the 1-hour Leqs at affected properties shall not exceed the following noise limits in Table NOI-1. In addition, the Municipal Code, Section 5.02.100 (Alternative Use of Maximum Noise Limits by dB(A) Levels) establishes exterior noise standards based on zoning districts.

TABLE NOI-1 CONSTRUCTION NOISE LIMITS AT AFFECTED PROPERTIES

Time	R-1 Zone (Single-Family Residential)	R-3, RPD, Mixed Use Zones (Multifamily Residential)	CPD, FCD, Public/Semi-Public, Open Space Zones (Commercial)
Weekdays 7:00 a.m. – 6:00 p.m.	75 dB	80 dB	85 dB
Saturdays 9:00 a.m. – 5:00 p.m.	60 dB	65 dB	70 dB

Source: City of La Canada Flintridge Municipal Code Section 5.02.110

1 During Daylight Savings Time, weekday hours shall be from 7:00 a.m. to 7:00 p.m.
2 Construction, except emergency work, is not permitted on Sunday or holidays.

Section 5.02.060 (Persistent Noises) states that failure to comply with the following provisions shall constitute a nuisance and violation of the Municipal Code:

A. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

B. Unnecessary idling of internal combustion engines is prohibited.

C. All stationary noise-generating construction equipment such as tree grinders and air compressors are to be located as far as is practical from existing residences.

D. Quiet construction equipment, particularly air compressors, are to be selected whenever possible.

City of La Canada Flintridge General Plan Noise Element

The city's General Plan Noise Element provides guidance for the acceptability of certain types of development within specific CNEL noise contours, which serves as the criteria for assessing the compatibility of proposed land uses in corresponding land use designations. The purpose of the city's Land Use Compatibility standards is to identify potential conflicts between proposed land uses and the noise environment, which the city uses as criteria for assessing the compatibility of proposed development at the General Plan and zoning levels of approval, as well as for CEQA analyses. Single-family, duplex, and accessory living units are normally acceptable up to 65 dB. Multi-family and senior housing are normally acceptable up to 70 dB. Mixed-use is normally acceptable up to 75 dB. Proposed uses in noise environments that exceed the normally acceptable levels require a detailed analysis of noise reduction requirements and noise insulation features required to be included in design.

The City's General Plan Noise Element also provides interior and exterior noise guidelines for various types of uses and development. The interior and exterior noise guidelines function as City policy for new land uses and acceptable noise levels for development of new land uses. Residential land uses have an exterior noise standard of 65 dB (Ldn or CNEL) and an interior noise standard of 45 dB (Ldn or CNEL). Interior noise standards are with closed windows and do not apply to bathrooms, closets and corridors. Exterior noise standards apply to the rear yard of single-family homes, multi-family patios and balconies (with a depth of 6 feet or more), and common recreation areas.

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. There is no specific proposed development under the project at this time. Future development proposals consistent with the Housing Element Update would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potentially significant noise

impacts. Because the details regarding future development are not known at this time, construction and operational noise is analyzed qualitatively.

CONSTRUCTION-RELATED NOISE IMPACTS

Construction activities associated with individual development projects under the Housing Element Update would generate temporary noise increases. Noise impacts from construction activities associated with the future development would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. Subsequent environmental review of future development projects would be required to assess potential conflicts with the City's Municipal Code. Section 5.02.060 (Persistent Noises) of the Municipal Code also requires construction noise best management practices. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

OPERATIONAL-RELATED NOISE IMPACTS

The siting of individual development projects could expose future residents of individual development projects under the Housing Element Update to noise levels that exceed the City's Land Use Compatibility standards in the General Plan Noise Element. Subsequent environmental review of future development projects would be required to assess potential exceedances of the City's General Plan Noise Element Land Use Compatibility Standards and to implement mitigation measures, if necessary.

Operation of individual development projects under the Housing Element Update could generate a permanent noise increase. Operational noise associated with the future development would primarily consist of motor vehicle use by new residents and stationary noise sources such as HVAC. Subsequent environmental review of future development projects would be required to assess potential exceedances of the City's General Plan Noise Element exterior and interior noise standards. Section 5.02.060 (Persistent Noises) of the Municipal Code also requires construction noise best management practices.

Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

b. LESS THAN SIGNIFICANT IMPACT. Construction activities associated with individual development projects under the Housing Element Update would generate temporary vibration increases. Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. At the highest levels of vibration, damage to structures is primarily architectural and rarely results in any structural damage. A peak particle velocity (ppv) threshold of 0.5 inches per second or less is sufficient to avoid structural damage (Caltrans, 2013). Vibrational effects from typical construction activities are only a concern within 25 feet of existing structures (Caltrans, 2002). Subsequent environmental review of future development projects would be required to review proposed construction activities and to assess potential exceedances of Caltrans vibrational standards. Since no specific development projects are proposed at this time and future development projects resulting from the Housing Element Update would be subject to separate environmental review pursuant to CEQA, this impact would be less than significant.

c. LESS THAN SIGNIFICANT IMPACT. The City is subject to some distant aircraft noise, though the City is not within the vicinity of a public airport or private airstrip, or within an airport land use plan. The nearest airport is the Bob Hope Airport, located approximately eight miles to the west. At this distance, no effects

related to airport noise would occur at individual development projects. Therefore, there would be no impact.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

NOI-1: Implementation of the following multi-part mitigation measures is required to reduce potential construction period noise impacts:

- Noise Reducing Features. All noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. During operation, mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
- Use of Electrical Equipment. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Location of Equipment and Support Areas. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Speed Limits. Construction site and access road speed limits shall be established and enforced during the construction period.
- Signal Limits. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Use of Audio Equipment. No project-related public address or music system shall be audible at any adjacent receptor.
- Resolution of Complaints. The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the City shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e. idling in excess of 5 minutes) is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- All on-site demolition and construction activities, including deliveries and engine warm-up, shall be restricted to the hours of 7:00 a.m. and 6:00 p.m. weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction, except emergency work, is not permitted on Sundays or holidays.

NOI-2: Noise Study. The 60 dBA CNEL contour would be expected to increase approximately 158 feet for I-210 and 24 feet for SR 2. The 65 dBA CNEL contour could be expected to increase approximately 96 feet for I-210 and up to 128 feet for SR-2. The 70 dBA CNEL contour could be expected to increase approximately 55 feet for I-210 and up to 92 feet for SR-2. All three of these contours would increase due to ambient growth in Southern California.

Therefore, pursuant to NE Policy 2.2.1 and NE Policy 2.2.5 of the proposed General Plan Update, the following requirements shall be incorporated into the General Plan Policy Implementation Program and made part of future noise studies and mitigation requirements:

- Noise Reducing Features. All noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. During operation, mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
- Use of Electrical Equipment. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Location of Equipment and Support Areas. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Speed Limits. Construction site and access road speed limits shall be established and enforced during the construction period.
- Signal Limits. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Use of Audio Equipment. No project-related public address or music system shall be audible at any adjacent receptor.
- Resolution of Complaints. The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the City shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

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

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development throughout the City. The RHNA is a planning goal and not a construction mandate. To meet the City's RHNA of 612 units, the HEU identifies a series of implementing actions to increase the City's housing capacity that would accommodate projected/planned population growth in the City. Future housing development facilitated by the HEU would be subject to environmental review under CEQA and discretionary permits and would occur as market conditions allow and at the discretion of the individual property owners. Any future housing development facilitated by the HEU would occur in urbanized locations near existing infrastructure (roads, utilities) and served by all public utilities.

SCAG's regional growth assessment contains population projections for the City, which are based on the current General Plan. Based on the HEU, the City's population was 20,261 in 2020. Based on SCAG forecasts, the City's population is anticipated to reach 21,600 persons by 2045, an approximately 6.6 percent population growth between 2020 and 2045 (SCAG, 2020).

The forecast population growth from future housing development facilitated by the HEU is presented in Table PH 1-1 below, Population Increase from Housing Element Update.

TABLE PH-1 POPULATION INCREASE PROJECTED FROM HOUSING ELEMENT UPDATE

Definition	6th Cycle Housing Element
Number of Units	612
Persons per household	3.15
Forecast Population Growth with HEU	1,928
2020 Population Estimate	20,261
Forecast Population with HEU Total	22,189
Forecast Population Percent Growth with HEU Total	9.5%

As previously noted, the HEU update would result in a significant impact if it would "induce substantial unplanned population growth in an area." As indicated in **Table PH-1**, the forecast population growth resulting from future housing development facilitated by the HEU is 1,928 persons, or an approximately 9.5 percent increase compared to the City's existing population of 20,261 persons in 2020. The slight variation in population forecasts is not considered substantial given it would theoretically occur over an extended eight year planning period (i.e., 2021 through 2029). Additionally, the future housing development facilitated by the HEU is intended to be dispersed throughout the City to accommodate projected population growth. Importantly, the RHNA is not a housing construction mandate and the City is not required to construct the housing; rather the City is required to demonstrate that it can accommodate the 6th Cycle RHNA.

Additionally, the City's forecast population including future housing development facilitated by the HEU of approximately 1,928 persons would be less than SCAG's forecast population by 2035. Moreover, because SCAG population forecasts are based on the General Plan and the project does not propose changes in land use designations, the project would not conflict with SCAG forecasts. Therefore, the corresponding population and housing growth would not be considered "unplanned" population growth as compliance with RHNA is essentially non-discretionary for local municipalities.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA as part of the City's development review process, and would be assessed on a project-by-project basis for potential effects concerning population growth. Additionally, future housing development would be subject to compliance with all federal, state, and local requirements for minimizing growth-related impacts. Therefore, the HEU would not induce substantial unplanned population growth in the City directly or indirectly, a less than significant impact would occur.

b. LESS THAN SIGNIFICANT IMPACT. SB 166 (2017) requires a City to ensure that its Housing Element inventory can accommodate its share of the regional housing need throughout the eight year planning period of 2021-2029. It prohibits a City from reducing, requiring, or permitting the reduction of the residential density to a lower residential density than what was utilized by the HCD for certification of the Housing Element, unless the City makes written findings supported by substantial evidence that the reduction is consistent with the adopted General Plan, including the Housing Element.

Compliance with SB 166 would minimize the potential for future housing displacement. The candidate housing site inventory would be sufficient to accommodate the City's RHNA allocation, and all HEU actions would occur such that there is no net loss of residential unit capacity. Therefore, the HEU's potential impacts, including from future development facilitated by the HEU, concerning displacement of existing people or housing, and need to construction replacement housing elsewhere would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

XV. Public Services *a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Fire protection?	☐	☐	☒	☐
2. Police protection?	☐	☐	☒	☐
3. Schools?	☐	☐	☒	☐
4. Parks?	☐	☐	☒	☐
5. Other public facilities?	☐	☐	☒	☐

DISCUSSION

a1 – a5. LESS THAN SIGNIFICANT IMPACT.

FIRE PROTECTION SERVICES

The project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development and enhanced public safety throughout the City. The entire City is located in the CalFire designated VHFHSZ. Future housing development facilitated by the HEU and the resulting population growth of approximately 1,928 persons (see Section XIV, Population and Housing) would incrementally increase the demand for fire protection services.

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency services to the City. As most of the candidate housing sites are developed, and all are urban infill sites, they are already served by the LACFD. Future housing development facilitated by the HEU would incrementally increase the demand for fire protection services to those vacant areas. However, the proposed vacant sites are in urbanized locations near existing infrastructure (e.g., roads and utilities) and would be located near areas already served by the LACFD. Therefore, because the construction of new fire protection facilities to serve the future housing development facilitated by the HEU is not anticipated, the project would not result in physical impacts in this regard. No impact is anticipated concerning construction of fire protection facilities.

As the City has no municipal water service, the Foothill Municipal Water District (FMWD), provides water to four retailing agencies that directly serve the city: the Mesa Crest Water Company, La Cañada Irrigation District, Valley Water Company, and Crescenta Valley Water District. These four agencies are responsible for the City's water infrastructure, providing both drinking water and water for firefighting purposes. According to the purveyors, the city has adequate water supply to serve its projected population through 2040. Pursuant to State law, when water supply becomes an issue and an allocation system must be put in place, then the water purveyors are required to provide priority status to affordable housing projects for water allocation.

Due to the age of the city, which was mostly built prior to incorporation in 1976, water infrastructure and supply may not meet current standards. In many areas of La Cañada Flintridge, fire hydrants may not meet current Fire Code standards for spacing and the reliability of the water distribution infrastructure for firefighting is unknown. The City does not have jurisdiction to require the water agencies to routinely maintain and test the water infrastructure.

During the development review process, the City and the Los Angeles County Fire Department (LACoFD) will review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting. The City also will work with the four water districts listed above to encourage them to evaluate the adequacy of emergency water line capacity as it relates to fire flow requirements, and both test and evaluate the reliability of the water infrastructure. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to the version of the California Fire Code in effect at the time of the future development and LCFMC §4.01 (Uniform Fire Code). Additionally, future housing developments would be required to submit a will-serve letter or service questionnaire in conjunction with their applications to ensure that both fire protection services are available to serve the proposed housing development. Compliance with the established regulatory framework would minimize impacts to fire protection services.

The project does not include any ground disturbing activities or new development. All new residential units in the City would be required to meet all of the applicable fire codes set forth by the State Fire Marshal, LACFD, and the City's building code. Implementation of the proposed project may result in a future incremental increase in the demand for emergency services; however, the future development would be located within existing urbanized areas of the City primarily in the form of urban infills sites. The locations of future development would not place an undue hardship on the LACFD since they are presently servicing the City from two locations on Foothill Boulevard (Stations 19 and 82). In addition, the LACFD reviewed the Draft HEU and SEU and provided recommendations to reduce potential future impacts to fire protective services which have been incorporated in the Draft HEU and SEU. The LACFD would also review future building plans when they are submitted to the City and would also identify and provide additional recommendations to reduce any potential impacts. In addition, prior to final project approval, the Los Angeles County Fire Marshal would verify that future projects have been designed to conform to all applicable codes. Therefore, implementation of the proposed project would not exceed the capacity of LACFD to serve the City with existing fire protection services and resources. The proposed project would result in less than significant impacts to fire protective services.

POLICE PROTECTIVE SERVICES

As previously noted, the project would not result in direct housing construction, but would facilitate future housing development and enhanced public safety in the City. Future housing development facilitated by the HEU and the resulting population growth of approximately 1,928 persons (see Section XIV, Population and Housing) would incrementally increase the demand for police protection services. The County of Los Angeles Sheriff's Department (LACSD) provides police protection services and law enforcement to the City. The facility serving the City is located at 4554 Briggs Avenue in La Crescenta-Montrose. Only three of the candidate housing sites are vacant; therefore the majority of the sites are developed with existing structures and already served by the LACSD. As previously mentioned, almost all proposed candidate housing sites currently generate demand for police protection services. Future housing development facilitated by the HEU would incrementally increase the demand for police protection services to vacant sites however all sites are urban infill sites already within the service area for police and are in urbanized locations near existing infrastructure (e.g., roads and utilities) and would be located near areas already served by the LACSD. Given the City's buildout nature, future housing development under the HEU is not

anticipated to create a need to expand police protection facilities. The City would review future housing development applications to ensure compliance with the established regulatory framework. Compliance with the established regulatory framework would minimize impacts to police protection services. Therefore, the HEU would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities. The SEU is wholly designed and intended to promote public safety in the City by creating new goals, policies and programs that support and enhance community safety. Therefore, impacts would be less than significant, and no physical environmental impacts would occur.

SCHOOLS

As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU and the resulting population growth of approximately 1,928 persons (see Section XIV, Population and Housing) would incrementally increase the demand for school services. The City is primarily served by the La Canada Unified School District (LCUSD), with a small portion on the western edge of the City being served by the Glendale Unified School District (GUSD). The LCUSD currently has approximately 4,000 students in its school system, which includes three elementary schools, one middle school and one high school.

As noted above, the project would result in a small incremental increase in the city's population over the eight-year SCAG regional growth forecast planning period that could place cumulative demands on local schools or school operations, which could require additional school facilities. Any future housing development facilitated by the HEU would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new residential projects to offset the cost of new development. Future applicants would be subject to school developer fees from the LCUSD or GUSD. The current school impact fee structure is $4.08 per SF for residential projects. These fees are evaluated on a yearly basis and would be collected at the time of permit issuance. Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…".

Payment of these fees would provide an adequate financial base to construct and equip new and existing schools. Additionally, because the construction of new school facilities to serve the future housing development facilitated by the HEU is not anticipated, the project would not result in physical impacts in this regard. Therefore, impacts would be less than significant, and no physical environmental impacts would occur.

PARKS, LIBRARIES AND OTHER PUBLIC FACILITIES

As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU and the resulting population growth of approximately 1,928 persons (see Section XIV, Population and Housing) would incrementally increase the demand for parks, library and other public facilities. Any future housing development facilitated by the HEU would occur in urbanized locations near existing facilities that currently provide service to the City's residents. See also Section XVI, Recreation.

Therefore, it is anticipated that the increased demand would not be substantial or such that it would warrant construction of a new park or library facility. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new public facilities. Impacts would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

PS-1: Payment of applicable impact fees. Large urban service area amendments, annexation, and Specific Plan areas may require additional mitigation measures such as the provision of land for new facilities.

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

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development to accommodate regionally allocated/projected population growth through the year 2029. The RHNA is an eight year housing planning goal not a production requirement. Future housing development facilitated by the HEU and the resulting population growth of approximately 1,928 persons (see Section XIV, Population and Housing), would incrementally increase the use of existing recreational facilities such that no substantial physical deterioration would occur or be accelerated.

All future housing development facilitated by the HEU would be subject to the City's development review process and compliance with LCFMC requirements. To avoid the overuse of existing recreational facilities, including parks and trails, such that substantial physical deterioration would occur, future housing development projects would be subject to the City's development review process. The loss of any land with an existing General Plan land use designation of Open Space or Parks and Recreation and/or zoned Public/Semi-Public (Parks and Recreation or Open Space) and utilized for recreational purposes would be considered a significant impact. Similarly, neither the HEU or SEU would result in physical deterioration of any of the following facilities: City parks (Memorial, Glenola, Glenhaven, Olberz or Mayor's Discovery); City or County designated trails; Joint Use Agreement (LCUSD) facilities; Private facilities including Flintridge Riding Club, La Cañada Flintridge Country Club, La Cañada Golf Course, Crescenta- Cañada YMCA, and Flint Canyon Tennis Club or Descanso Gardens. During the City's development review process, any future housing development that would result in physical deterioration of the aforementioned facilities would be considered a significant impact and mitigation would be required.

However, none of the candidate opportunity sites would be located on land planned or zoned for open space, parks or recreation; therefore, less than significant impacts would occur with implementation of the HEU and SEU. All future housing development that involves subdivision of land would be subject to payment of City fees in order help fund the acquisition and development of new or rehabilitating existing park and recreational facilities needed to accommodate added demands created by the addition of residential dwelling units.

Additionally, the HEU's candidate housing sites are dispersed throughout the City to minimize the potential for adverse changes in the neighborhood character and reduce the potential for adverse impacts on existing parks, trails and other recreational amenities. Adherence to mandatory discretionary permit requirements and regulations for providing recreation would support the City's goals as outlined in the General Plan Open Space and Recreation Element for providing sufficient public recreation opportunities for residents through the year 2030. For these reasons, the HEU and future housing development facilitated by the project would not result in substantial physical deterioration of existing neighborhood or regional parks, trails or other recreational facilities. Therefore, impacts would be less than significant.

b. LESS THAN SIGNIFICANT IMPACT. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development to accommodate projected future population growth in the City. The project does not propose the construction of new recreational facilities.

Existing recreational facilities in the City include the following facilities: City parks (Memorial, Glenola, Glenhaven, Olberz or Mayor's Discovery); City or County designated trails; Joint Use Agreement (LCUSD) facilities; Private facilities including Flintridge Riding Club, La Cañada Flintridge Country Club, La Cañada Golf Course, Crescenta- Cañada YMCA, and Flint Canyon Tennis Club and Descanso Gardens.

Future housing development facilitated by the project and the resulting population growth of approximately 1,928 persons would incrementally increase the demand for park and recreation land in the City. However, the increased demand for park and recreation facilities during the HEU planning period (2021-2029) would be nominal, dispersed Citywide over an eight-year period and could be accommodated by the existing public parks, trails and recreational facilities that are located throughout the City. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to demonstrate consistency with General Plan Policies. If in the future it is determined that construction of new recreational facilities is warranted, that proposal would be subject to the City's development review process and CEQA evaluation to determine whether adverse physical effects on the environment would occur. Therefore, a less than significant impact would occur regarding the construction and expansion of recreational facilities.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

XVII. Transportation/Traffic *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. The Proposed Project is a planning document which would not directly result in the development or construction of any new housing units. Development within the housing opportunity sites would be required to conduct a project level CEQA assessment, go through a design review process, and acquire the relevant permits prior to construction. The development of new units within the identified housing opportunity sites would still be required to conform with the ordinances in the City's Municipal Code, the transportation policies outlined in the City's General Plan-Circulation Element, as well as any other policies or guidelines outlined in other relevant transportation planning documents. Therefore, the Proposed Project would not conflict with an applicable plan, ordinance, or policy addressing the circulation system. As such, the Proposed Project's impact would be less than significant.

b. LESS THAN SIGNIFICANT IMPACT.

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

In response to the implementation of *CEQA Guidelines section 15064.3, subdivision (b),* the City of La Cañada Flintridge adopted VMT significance thresholds in July 2020 and prepared Draft Transportation Study Guidelines in September 2020 which outlines the impact screening criteria and the City utilizes to identify VMT related CEQA Impacts.

PROJECT SCREENING

As per the City's Transportation Study Guidelines, development Projects that fall within one of the following criteria can be assumed to have a less than significant VMT related impact. As such, projects meeting any one of the following criteria would be screened out from conducting a VMT assessment:

1. Projects located within a Transit Priority Area (TPA)[2]
2. Projects located within a low VMT area – Projects located within an area that currently generates an average daily VMT per Service Population of 31.47 miles[3].
3. Specific project land use types including:
    - Local-serving K-12 schools
    - Local parks
    - Day care centers
    - Local-serving retail uses less than 50,000 square feet
    - Local-serving hotels
    - Local-serving assembly uses
    - Community institutions
    - Affordable, supportive, or transitional housing
    - Assisted living facilities
    - Senior housing (as defined by HUD)
    - Local serving community colleges
    - Student housing projects
    - Public parking
    - Other local-serving uses as approved by the City Traffic Engineer
    - Projects generating less than 110 daily vehicle trips

PROJECT IMPACT CRITERIA

Projects not screened out through the steps above are required to complete a VMT analysis using the SCAG model or appropriate sub-area model. The VMT analysis is used to determine if the project has a significant VMT related impact under CEQA Guidelines section 15064.3. The VMT analysis compares the project generated VMT per Service Population to the City's established CEQA threshold of significance (31.47 miles)[2]. Projects that are anticipated to generate a higher VMT per Service Population are identified to have a significant impact.

SCREENING ANALYSIS

This section evaluates which, if any, of the 96 housing opportunity sites identified within the Proposed Project would be screened out from conducting a VMT analysis. Some of the housing opportunity sites are located on adjoining parcels and thus have been identified to have the potential to be developed together as a single consolidated project (Consolidated Sites A-V). As a worst case scenario, the individual parcels within these consolidated sites were analyzed together as one larger project in-lieu of series of smaller projects on each individual parcel. This is assumed to be a worst case scenario, as smaller projects can be screened out from conducting a VMT analysis, as discussed further below.

[2] TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high- quality transit corridor per the definitions below. Public Resources Code § 21099(a)(7). Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[3] The Base Year (2012) Sothern California Association of Governments (SCAG) travel forecasting model identified an average daily VMT / Service Population of 37.02 miles for the Northwest Sub Area, where the City of La Cañada Flint Ridge is located. As noted in the City's Transportation Impact Guidelines, the impact threshold is 15% below the regional mean. Therefore, 31.47 miles (37.02 miles x 85%) is set as the City's VMT/Service Population threshold.

Since the housing opportunity sites are spread throughout the city and each site has unique set of circumstances (existing land uses, unit type, zoning, etc.), each site was evaluated individually. Additionally, the screening criteria established within the City's Transportation Impact Guidelines is intended to be conducted at the project level; therefore, this analysis was conducted at the project level instead of the program level. The following reviews each of the screening criteria established within the City's Transportation Impact Study Guidelines:

1. *Projects located within a TPA* – There are currently no TPAs within the City of La Cañada Flintridge; therefore, no housing opportunity sites were screened out based on this category.
2. *Projects located within a low VMT area* – There are currently no areas within the City of La Cañada Flintridge that generate an average daily VMT per Service Population of less than 31.47 miles; therefore, no housing opportunity sites were screened out based on this category.
3. *Specific project land use types* – Table TT-1 outlines the housing opportunity sites identified within the Proposed Project, including the number of allowable units, the unit income type, and the projected daily trip generation. As noted in the City's Transportation Impact Study Guidelines affordable housing units as well as projects anticipated to generate less than 110 daily trips are assumed to have a less than significant VMT related impact. Therefore, housing opportunity sites that fit this criteria are identified within the table.

TABLE TT-1 SUMMARY OF HOUSING OPPORTUNITY SITES

Site #	New Unit Potential[1]	Consolidation Site[2]	Total Unit Potential[3]	Income Category	Trip Generation (ADT)[4]	Screened Out Based on ADT or Unity Type?
1	1	None	1	Above Moderate	8	Yes - Less than 110 ADT
2	1	None	1	Above Moderate	8	Yes - Less than 110 ADT
3	1	None	1	Above Moderate	8	Yes - Less than 110 ADT
5	0	A	3	Above Moderate	22	Yes - Less than 110 ADT
6	1					
7	0					
8	1					
9	0					
10	0					
11	1					
12	1	B	9	Moderate	66	Yes - Less than 110 ADT
13	2					
14	1					
15	1					
16	2					
17	2					
18	1	C	24	Above Moderate	176	No
19	8					
20	1					
21	1					
22	0					
23	0					
24	2					
25	1					
26	10					
27	2	D	10	Above Moderate	74	Yes - Less than 110 ADT
28	3					
29	5					
30	2	E	9	Moderate	66	Yes - Less than 110 ADT
31	2					

Site #	New Unit Potential[1]	Consolidation Site[2]	Total Unit Potential[3]	Income Category	Trip Generation (ADT)[4]	Screened Out Based on ADT or Unity Type?
32	1					
33	1					
34	3					
35	1	U	3	Moderate	22	Yes - Less than 110 ADT
45	1					
37	1	V	4	Moderate	30	Yes - Less than 110 ADT
38	2					
39	1					
40	1	F	6	Moderate	44	Yes - Less than 110 ADT
41	1					
42	1					
43	2					
46	1					
47	1					
48	3	G	9	Moderate	66	Yes - Less than 110 ADT
49	3					
50	3					
51	11	H	32	Moderate	235	No
52	8					
53	5					
54	8					
55	2	I	7	Moderate	52	Yes - Less than 110 ADT
56	5					
57	9	J	35	Moderate	257	No
58	26					
59	19	K	34	Moderate	249	No
60	3					
61	3					
62	4					
63	5					
64	8	L	21	Moderate	154	No
65	13					
67	5	M	13	Moderate	96	Yes - Less than 110 ADT

Site #	New Unit Potential[1]	Consolidation Site[2]	Total Unit Potential[3]	Income Category	Trip Generation (ADT)[4]	Screened Out Based on ADT or Unity Type?
68	0					
69	4					
70	4					
71	10	None	10	Moderate	74	Yes - Less than 110 ADT
72	18	None	18	Moderate	132	No
73	96	None	96	Lower	703	Yes – Affordable Housing
74	13	None	13	Lower	96	Yes – Affordable Housing & Less than 110 ADT
75	40	None	40	Lower	293	Yes – Affordable Housing
76	23	None	23	Lower	169	Yes – Affordable Housing
77	9	None	9	Lower	66	Yes – Affordable Housing & Less than 110 ADT
78	17	None	17	Lower	125	Yes – Affordable Housing
79	24	None	24	Lower	176	Yes – Affordable Housing
80	8	O	104	Lower	762	Yes – Affordable Housing
81	64					
81	10					
83	7					
84	3					
85	12					
86	7	P	124	Lower	908	Yes – Affordable Housing
87	75					
88	25					
89	17					
90	28	Q	63	Lower	462	Yes – Affordable Housing
91	35					
92	2	R	5	Above Moderate	37	Yes - Less than 110 ADT
93	2					
94	1					
95	6	T	12	Lower	88	Yes – Affordable Housing & Less than 110 ADT
96	6					

[1] New Units Potential: Total number of units allowed on the parcel (based on zoning) minus the existing number of units on the parcel.
[2] Consolidation Site: Area in which individual parcels can be combined into a larger consolidated site.
[3] Total Unit Potential: Total number of new units that can be constructed within the consolidated site.
[4] Source: ITE Trip Generation Manual 10th Edition– Multi-Family (Low-Rise) – 220 – 7.32 ADT per Unit.

As shown in the table, most of the housing opportunity sites were initially screened out from conducting a VMT analysis based on their projected daily trip generation or unit type. These sites are assumed to have a less than significant impact.

The sites that were not identified to be screened out based on their trip generation or unit type may still be local serving in nature and can still be screened out based on approval of the City's Traffic Engineer. As noted in the City's Transportation Impact Study Guidelines:

> Any project that uses the designation of "local-serving" should be able to demonstrate that its users (employees, customers, visitors) would be existing within the community. The project would not generate new "demand" for the project land uses but would meet the existing demand that would shorten the distance existing residents, employees, customers, or visitors would need to travel.

All of the housing opportunity sites identified within the Proposed Project are located within mixed-use areas. Therefore, residential development on these sites should increase the overall housing density next to the City's job centers. Implementing additional housing within these sites should reduce residential and employment trip lengths, as it will give employees an option to live closer to their jobs. Additionally, the shorter trip lengths could potentially reduce the vehicular mode share within the area, as walking, biking, and transit trips become more viable with shorter trip lengths. To determine if the housing opportunity sites, not screened out in Table TT-1, would meet the local serving use criteria outlined above, a with and without project VMT analysis was conducted. With and without project VMT was analyzed using the San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool[4]. Table TT-2 displays the with and without average daily VMT per Service Population for each of the Housing Opportunity sites that was not previously screened out.

TABLE TT-2 ANALYSIS OF LOCAL SERVING HOUSING OPPORTUNITY SITES

Site #	Consolidation Site	Total Unit Potential	VMT per Service Population		
			Without Project	With Project	Change
18	C	24	51.99	51.69	-0.30
19					
20					
21					
22					
23					
24					
25					
26					
51	H	32	39.15	39.04	-0.11
52					
53					

[4] https://apps.fehrandpeers.com/SGVCOGVMT/

Site #	Consolidation Site	Total Unit Potential	VMT per Service Population		
			Without Project	With Project	Change
54					
57	J	35	39.15	39.03	-0.12
58					
59	K	34	51.99	51.65	-0.34
60					
61					
62					
63					
64	L	21	39.15	39.08	-0.07
65					
72	None	18	51.99	51.81	-0.18

Source: SGVCOG VMT Evaluation Tool

As shown in the table, the implementation of the additional housing units within these sites would result in a decrease in VMT per Service Population at every site analyzed. As noted previously, this is predominantly due to the mixed use nature of the identified sites as well as their location near the City's job centers. Therefore, these sites should be assumed as locally serving and would be screened out from conducting further analysis. Additionally, as noted in CEQA Guidelines section 15064.3, subdivision (b): "Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact." Therefore, the implementation of the Proposed Project on these sites would result in a less than significant impact.

PROJECT CONSTRUCTION

Construction worker related VMT would not be newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which construction workers travel to each day. Therefore, construction workers are not generating new VMT each day, only redistributing it. It is important to note that construction traffic is temporary and not expected to significantly increase VMT in the region over any length of time. This redistribution is considered to have a nominal and momentary effect on the regional and citywide daily VMT. Consequently, it is assumed that there will be no major changes in regional circulation during construction of the Proposed Project, resulting in no conflicts or inconsistencies with CEQA Guidelines section 15064.3, subdivision (b).

C. LESS THAN SIGNIFICANT IMPACT. The Proposed Project would not substantially increase hazards due to a design feature or incompatible uses (e.g., farm equipment). The Proposed Project does not include proposals for new transportation facilities or changes in General Plan land use designations that would introduce new traffic from incompatible uses such as farm equipment to the City's transportation network. In addition, the City design standards establish required roadway cross-section dimensions, design speeds, sight distance, and turning radii requirements which have been formulated to reduce hazards within the City's transportation system. New development within the housing opportunity sites will be required to utilize and conform to these standards; therefore, they will have a less than significant impact.

d. LESS THAN SIGNIFICANT IMPACT. The Proposed Project would not result in inadequate emergency access. New development projects within the City are reviewed by the County of Los Angeles Fire Department to ensure adequate emergency access. Additionally, Policy 3.1.4 of the City's General Plan Safety Element requires that development projects "Evaluate the City's roadways regarding access, alignments, two routes for egress, etc., to facilitate fire, police, and ambulance access and resident egress in case of an emergency." Policy 3.1.5 of the Safety Element will result in the prohibition of parking on one or both sides of streets identified as having the potential to interfere with emergency vehicle access and/or resident evacuation during red flag alerts. New development within the housing opportunity sites will be required to utilize and conform to these standards; therefore, they will have a less than significant impact.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City.

TR-1: Mitigation measures identified per the City's Traffic Impact Analysis Guidelines per the City Traffic Engineer or a qualified transportation engineering consultant, with agreement by the City's Traffic Engineer, on a project-by-project basis.

XVIII. Tribal Cultural Resources *Would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resources, 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 a landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☐	☒	☐
(i) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the 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 resources to a California Native American tribe?	☐	☐	☒	☐

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. No effects on known tribal cultural resources under CEQA are anticipated with project implementation, as the project would not involve any ground disturbing activities, demolition or construction.

The proposed project would not have an effect on any resources or structures identified on the California Register of Historical Resources or on the City's Historic Registry as no development, ground disturbance or subsurface excavation is proposed by the project. Projects that have the potential to excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more could have a potentially significant impact on tribal cultural resources. However, lands within the City having the potential for unknown tribal cultural resources and Native American monitoring for future active ground disturbing activities that arise out of the project is recommended by the City for construction projects.

City staff consulted with California Native American tribal representatives per the requirements of AB 52 and SB 18 on the potential impacts of the project. No concerns regarding tribal cultural resources were raised by local tribes as no impacts to unknown tribal cultural resources are anticipated as no ground disturbance is proposed by the project Therefore, no impacts to known or unknown tribal cultural resources would occur with the project.

However, as there is a potential for cultural and tribal cultural resources to be identified during earth disturbing activities, Native American monitoring would be required during the initial ground disturbing activities for any future ground disturbing for housing development projects.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project. However, the list below contains the standard Mitigation Measures included in the City's Draft Local CEQA Guidelines and/or General Plan Update Program EIR that are applicable to all future ground disturbing land development projects in the City. Please also refer to the Cultural Resources mitigation measures contained in Section V. of this Initial Study/Mitigated Negative Declaration.

TCR-1: Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.

TCR-2: Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the applicable Native American Tribe. A copy of the executed contract shall be submitted to the City of La Cañada Flintridge Community Development Department. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the project site have little to no potential for impacting Tribal Cultural Resources.

TCR-3: Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.

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

DISCUSSION

a. – c. LESS THAN SIGNIFICANT IMPACT.

RELOCATED, NEW OR EXPANDED UTILITY OR SERVICE SYSTEM INFRASTRUCTURE

The proposed project would not result in any new development or ground disturbing activities. Of critical importance to the maintenance of existing housing and development of new housing is the availability of adequate infrastructure, including water facilities, drainage and debris channels, sewage facilities, and streets and related infrastructure.

A significant infrastructure constraint in the City has been the lack of sanitary sewers to serve the city. For a number of years, only two areas were served with public sewers: the northeastern section near the La Cañada Flintridge Country Club and the western-most section along Ocean View Boulevard and near Glen Haven Park.

In 1998, the City embarked on a process to provide sewers to all residences within the city limits. The City installed a trunk sewer system along Foothill Boulevard to support intensified development along the

Foothill Boulevard commercial corridor, including parcels designated for multi-family development. The possibility of connecting homes to the Glendale sewer system is also being pursued. Under existing conditions, there are only about 20 homes north of Foothill that are not connected to a sewer system.

Future residential and mixed use developments are expected to concentrate along the Foothill Boulevard corridor, which is the portion of the city with a wastewater system in place. Adequate capacity is available to accommodate growth in the portion of the city that is served by a wastewater (sewer) system. When additional areas are provided with sewers, additional capacity will be acquired from the districts.

Virtually all of the future residential development for fulfilling the RHNA is expected to be accommodated along the Foothill Boulevard corridor. Sites to be designated for future residential within the Downtown Village Specific Plan and Mixed Use land use designations have already been annexed into either the Los Angeles County Sanitation District No. 28 and 34 (Sewer Assessment District 1, 2 and 3B) or the Crescenta Valley Water District (Sewer Assessment District 3A) that discharges via the City of Los Angeles Department of Public Works, Bureau of Sanitation.

New construction/development would be required to comply with either the LACSD or the City of Los Angeles requirements for trunk sewer system disposal facilities. The City offers has the Sewer Connection Grant Program to assist lower and moderate-income households, especially extremely low income households, with the costs of connecting single-family homes to the City's sewer system in the City's sewer districts (Program 11). The increase in wastewater at buildout of the General Plan in 2030 is estimated at about 0.5 percent of existing capacity and is not considered to result in the need for additional wastewater facilities.

Future housing in the City is anticipated to be on urban infill development/redevelopment sites surrounded by existing development on all sides. All wet and dry public utilities, facilities and infrastructure are in place and available to serve the new housing opportunity sites. While utility and service connections would be needed to accommodate the new housing units, and some utilities and service system would need to be extended or enlarged to and from the new housing opportunity sites (e.g., sewer, storm water runoff, electrical, etc.), these new connections would not result in a need to modify the larger off-site infrastructure.

As the project is a long-term policy planning document for housing and public safety, and is within the General Plan population growth estimates anticipated through 2030 its adoption is not anticipated to be inconsistent with any of the applicable plans or exceed the capacity of any existing system, including but not limited to the Applicable Urban Water Master Plan; Applicable Wastewater Treatment Facility (https://www.lacsd.org/services/wastewatersewage/default.asp); Greater Los Angeles Integrated Regional Water Management Plan; or conflict with LCFMC Chapter 9.21 Stormwater Management. As a result, implementation of the proposed project would have a less than significant impact on water, wastewater treatment, storm water drainage, electrical power, natural gas, or telecommunications facilities or infrastructure.

d – e. Less than Significant Impact.

Solid Waste Generation

The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development and enhanced public safety throughout the City. To meet the City's RHNA of 612 units, the HEU identifies a series of implementing actions to increase the City's housing capacity that would accommodate planned population growth in the City. Future housing development facilitated by the HEU would be subject to environmental review under CEQA and discretionary permits and

would occur as market conditions allow and at the discretion of the individual property owners. Any future housing development facilitated by the HEU would occur in urbanized locations near existing infrastructure (roads, utilities) and served by existing municipal solid waste and recycling services companies such as Republic Services. Therefore, implementation of the proposed project would not generate any solid waste and would not result in an exceedance of the capacity of local landfills, resulting in less than significant impacts.

COMPLIANCE WITH SOLID WASTE STATUTES AND REGULATIONS

The City complies with all federal, State, and local statutes and regulations related to solid waste, such as AB 939 and AB 341. Republic Services also complies with all applicable federal and State solid waste regulations. The Los Angeles County DEH issues permits to all solid waste facilities in the county. No solid waste would be generated by the project as the HEU and SEU are necessary public policy updates to ensure adequate housing supply and public safety in the City and do not involve any direct development or construction. Therefore, implementation of the project would be consistent with all applicable federal, State and local management and reduction statues and regulations regarding solid waste, resulting in less than significant impacts.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

XX. Wildfire *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

SETTING

VERY HIGH FIRE HAZARD SEVERITY ZONES (VHFHSZ)

The California Department of Forestry and Fire Protection (CAL FIRE) maps areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors, pursuant to Public Resources Code §§ 4201-4204 and Government Code §§ 51175-51189. These areas are referred to as Fire Hazard Severity Zones (FHSZs) and are identified for areas where the state has financial responsibility for wildland fire protection (i.e., State Responsibility Area (SRA)), and areas where local governments have financial responsibility for wildland fire protection (i.e., Local Responsibility Area (LRA)). The City *is in a* LRA and the entire City is designated as a Very High Fire Hazard Severity Zone (VHFHSZ). This section describes the existing conditions in the City and the surrounding area associated with wildfire hazards.

WILDFIRE

A wildfire is an uncontrolled fire in an area of extensive combustible fuel, including vegetation and structures. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, and brushland areas that act as a source of fuel. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. The City is situated in the Crescenta Valley and the far western end of the San Gabriel Valley. It is characterized by rugged topography with highly flammable vegetation. As such, much of the surrounding area shares the VHFHSZ designation by CAL FIRE (CAL FIRE, 2021). La Cañada Flintridge experiences moderate winters

and warm, dry summers that dry out vegetation. During the fall a dry and hot wind pattern known as Santa Ana winds further dries out vegetation.

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. As discussed above, the City is in a VHFHSZ. Fires that occur along the wildland-urban interface are more hazardous for people and property as they can spread into urbanized areas. The greatest potential for this hazard occurs at the urban fringe between the City and the Angeles National Forest that surrounds the valley floor to the north and northeast. Data from the wildfirerisk.org website published by the USDA Forest Service indicates that populated areas in La Cañada Flintridge have, on average, greater wildfire likelihood than 85% of all the communities in Los Angeles County (USDA, 2021). The City has 12 neighborhoods with a single point of entry, affecting over 10% of the current housing stock (See Draft Safety Element) which adds difficulty to executing the emergency evacuation plan. Because of the challenges of evacuating these neighborhoods, in these areas new development of accessory dwelling units (ADU's) will be prohibited and conversion of existing units to ADU's will also prohibited. Construction activities for new development could interfere with adopted emergency response or evacuation plans because of temporary construction activities. However, temporary construction would be subject to the City's permitting process and would be required to implement applicable policies. To provide for adequate emergency vehicle access to residential neighborhoods during red flag alerts, when weather conditions exist to produce an increased risk of fire, a prohibition of on-street parking on one or both sides of the street shall occur, depending on the existing road pavement width. Therefore, implementation of the Project would not impair or physically interfere with an evacuation plan. As a result, impacts would be less than significant, and no mitigation is required.

b. LESS THAN SIGNIFICANT IMPACT. A significant portion of vacant land within the City is on steep slopes with gradients greater than 30 percent (See Draft Safety Element). Much of this vacant land abuts the Angeles National Forest along the City's north and northeast boundary. The combination of southern California's Mediterranean climate, with its winter and spring rainfall and hot dry summers, a preponderance of highly flammable vegetation within and adjacent to the City, the steep topography within the City, and the frequency of high wind velocity from the Santa Ana winds creates optimum conditions for wildfires. To prevent exacerbating wildfire risks due to slope, new development would be required to comply with SE Policy 1.1.4: Development will only be allowed outside of areas of known slope instability and/or high landslide risk unless fully mitigated (See Draft Safety Element). New development would be required to maintain defensible space around their buildings by reducing the availability of combustible materials and ensuring that adequate access is provided. New construction is required to have fire retardant roofing and is required to comply will applicable Board of Forestry and Fire Protection Safe Regulations, and the most current version of the Building Codes and California Fire Code. As a result, adherence to standard City and State policies and regulations regarding fire codes would not result in exacerbating wildfire risks and impacts from wildfire pollution would be less than significant.

c. LESS THAN SIGNIFICANT IMPACT. All construction must follow the City's building permit process which includes LACFD approval of all new development and preparation of fire protection plans. During the development review process, the City and the LACFD review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting. New roads or infrastructure could be required to support new development, but, in keeping with State law (SB 1160), new utilities would be placed underground and would not exacerbate fire risk or result in other temporary or ongoing impacts to the environment. As a result, adherence to standard City policies in the installation or

maintenance of associated infrastructure would not exacerbate fire risk, and potential impacts would be less than significant.

d. LESS THAN SIGNIFICANT IMPACT. With its steep topography and semi-arid Mediterranean-type climate typified by heavy seasonal rainfall, the San Gabriel Mountains rangefront is a known area of substantial debris flow (i.e., mudslide) hazard; similar hazards apply in the Verdugo and San Rafael Hills. These risks are exacerbated when the land has been denuded due to wildfires, as is the case on property in the City's northern rangefront that was burned during the 2009 Station Fire and subsequent mudslides in 2010. In order to reduce the risk of downslope or downstream flooding or landslides, new development must comply with applicable City requirements for fuel modification zones, good site design principals and other fire prevention activities. New development must also comply with the requirements of the Hillside Development ordinance, designed to limit the impact of such development and ensure public safety. As discussed above, future development would be required to conform with SE Policy 1.1.4 restricting development to areas outside of areas of known slope instability and/or high landslide risk unless fully mitigated. New developments would additionally be required to conform to SE Policy 1.1.2, which requires development to be planned and designed to avoid flood, mudslide, and subsidence hazards to structures on or near hillside areas, as well as downhill of any project (See Draft Safety Element). Prior to construction all hillside development would be required to produce a preliminary soil report and a geotechnical report from a geotechnical engineer or certified engineering geologist. The geotechnical report shall identify geotechnical measures to mitigate hazard to the extent feasible. All construction must follow the City's building permit process which includes LACFD approval of all new development and preparation of fire protection plans. As a result, adherence to standard City policies in the installation or maintenance of associated infrastructure would not expose people or structures to significant risks, including downslope or downstream flooring or landslides, as a result of runoff, post-fire slope instability, or drainage changes; therefore, potential impacts would be less than significant.

STANDARD MITIGATION MEASURES, CONDITIONS OR REQUIREMENTS

None are applicable to the project.

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

DISCUSSION

a. LESS THAN SIGNIFICANT IMPACT. As proposed, the project would not have the potential to degrade the quality of the environment, reduce the habitat of any sensitive plant or animal species, or eliminate important examples of California history or prehistory as no construction or physical changes to the environment would occur.

Nonetheless, based on a number of factors indicating that the City is generally rich in cultural resources, unknown cultural and tribal cultural resources, and human remains, could be inadvertently discovered during future land development projects and ground-disturbing activities. Therefore, standard City Mitigation Measures are included in Attachment B to ensure that any future impacts would be reduced to less than significant levels.

b. LESS THAN SIGNIFICANT IMPACT. Implementation of the proposed project would not result in individually limited, but cumulatively considerable significant impacts. All resource topics associated with the project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less-than-significant impacts. In addition, taken in sum with other similar projects in the area, region and state, the project is intended to accommodate anticipated future regional population growth as identified by SCAG. Impacts to environmental resource or issue areas would be evaluated on a project-by-

project basis, for projects subject to review under CEQA, including a review for potential cumulatively considerable impacts. Therefore, impacts would be less than significant.

c. Less than Significant Impact. The project does not propose any uses or activities that would negatively affect any persons directly or indirectly. In addition, all resource topics associated with the project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less-than-significant impacts. Standard City Mitigation Measures are included in Attachment B and are intended to be implemented for future land development projects with ground disturbing activities. Consequently, the project would not result in any environmental effects that would cause substantial adverse effects on human beings directly or indirectly.

Standard Mitigation Measures, Conditions or Requirements

None are applicable to the project. However, refer to Attachment B for a list of standard Mitigation Measures that are applicable to all future ground disturbing land development projects in the City.

Chapter 4

REFERENCES AND LIST OF PREPARERS

References

Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents listed below are hereby incorporated by reference. The pertinent material is summarized throughout this Initial Study where that information is relevant to the analysis of impacts of the proposed project. Referenced documents that are followed by a star (*) are on file and available for review at the City of La Cañada Flintridge, Community Development Department, One Civic Center Drive, La Cañada Flintridge, CA 91011.

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Individuals and Organizations Consulted

- Susan Koleda, Director of Community Development, City of La Cañada Flintridge
- Mr. Joseph Ontiveros, Cultural Resources Director, Soboba Band of Luiseño Indians
- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Chief, San Gabriel Band of Mission Indians
- Sam Dunlop, Gabrieleño Tongva Tribe
- Valley Water Company
- Foothill Municipal Water District
- La Cañada Irrigation District
- Crescenta Valley Water District
- Los Angeles County Sanitation District
- Erinn Wilson-Olgin, California Department of Fish and Wildlife
- Miya Edmonson, California Department of Transportation, District 7
- Ronald M. Durbin, County of Los Angeles Fire Department
- Andrew Green, Native American Heritage Commission
- Ping Chang, Sothern California Association of Governments
- Lijin Sun, South Coast Air Quality Management District

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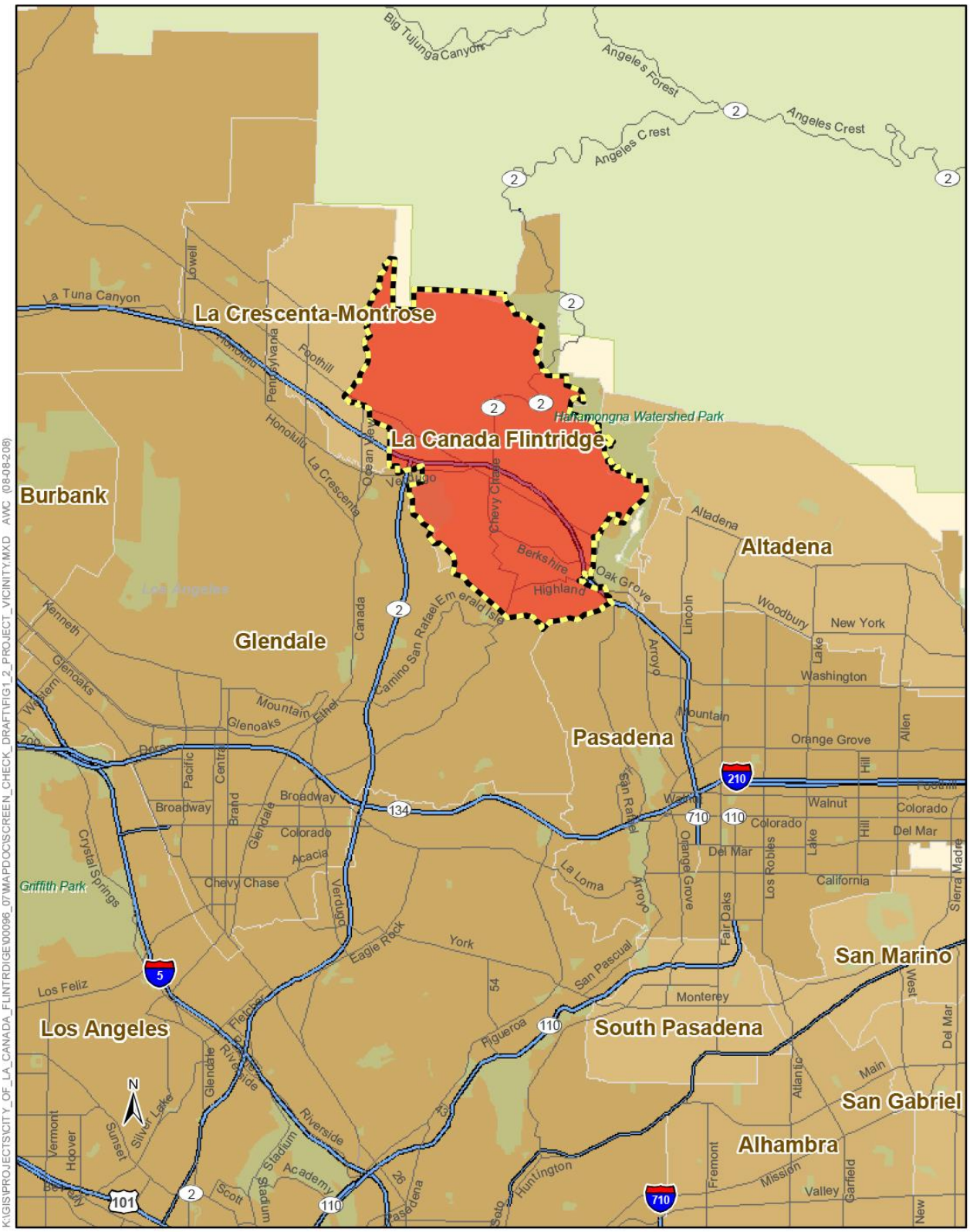
Attachment A – Figures

Source: ESRI Streetmap USA (2006)

Figure 1-1
Regional Location
City of La Cañada Flintridge



K:\GIS\PROJECTS\CITY_OF_LA_CANADA_FLINTRIDGE\00096_07\MAPDOC\SCREEN_CHECK_DRAFT\FIG1_2_PROJECT_VICINITY.MXD AWC (08-08-208)

SOURCE: ESRI Streetmap USA (2006)

Figure 1-2
Project Vicinity
City of La Cañada Flintridge

Figure 1-3 Land Use Map

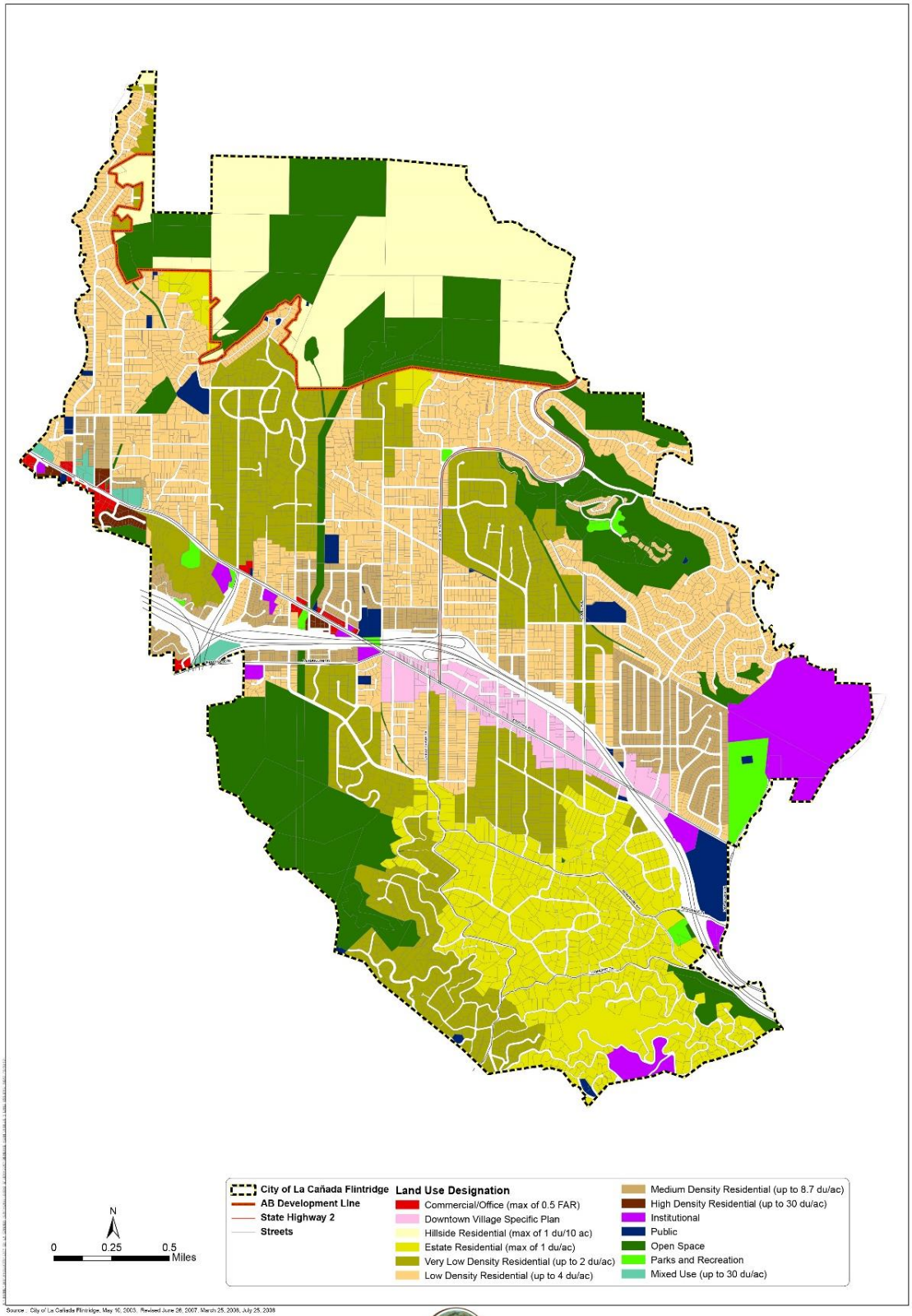


Figure LUE-1
Land Use Policy Map
City of La Cañada Flintridge

Attachment B – Mitigation Monitoring & Reporting Program

CITY OF LA CAÑADA FLINTRIDGE

MITIGATION MONITORING AND REPORTING PROGRAM

OCTOBER 2021

PROJECT NAME: General Plan Housing Element Update and Safety Element Update Project

LOCATION: This is a Citywide project

The following is a comprehensive list of standard Mitigation Measures, Conditions and Requirements that are generally applicable to future ground disturbing, land development projects in the City. These mitigation measures include those in the City's adopted 2030 General Plan EIR as well as the City's Draft Local CEQA Guidelines (in-progress).

There is some overlap (redundancy) between the mitigation measures included in the General Plan EIR and those in the Draft Local CEQA Guidelines. However, for purposes of providing a thorough and comprehensive listing of all potential mitigation measures available to the City, measures from both sources, are listed herein.

As determined to be applicable by the City, these measures are to be implemented before, during and after construction and can be incorporated as Conditions of Approval for any future or subsequent ground disturbing, land development projects in the City to ensue all potential impacts are avoided, minimized or reduced to less than significant levels.

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
Aesthetics				
AES-1	Design the project to be consistent with the development controls and design standards identified in the General Plan Land Use Element and Conservation Element, including LUE Goal 5, LUE Policy 5.1.1 through 5.1.4, LUE Policy 5.2.4, CNE Goal 2, CNE Objective 2.1, CNE Policy 2.1.1 through 2.1.6, CNE Objective 2.2, CNE Policy 2.2.2.			
AES-2	Setbacks, landscaping, and design features appropriate to substantially preserve public views. Compliance with applicable Zoning standards, Hillside Management Ordinance, Residential Design Guidelines, Preservation and Protection of Designated Trees on Private Property ordinance, and Downtown Village Specific Plan.			
AES-3	Comply with applicable LCF General Plan policies and actions and with the City's Outdoor Lighting Standards.			
Air Quality				
AQ-1	Compliance with South Coast AQMD Rule Book. (http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book),			
AQ-2	If the development review identifies construction emissions that exceed SCAQMD mass emission thresholds, avoidance or minimization measures shall be developed and implemented to ensure that emissions will be reduced below their respective thresholds. In addition to compliance with regulatory measures (including compliance with SCAQMD Rules and Regulations), the City shall require all new construction projects to incorporate all feasible mitigation where appropriate. Potential measures to reduce fugitive dust emissions include but are not limited to the following: • Active grading sites will be watered one additional time per day beyond that required by			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	Rule 403. • Contractors will apply approved nontoxic chemical soil stabilizers to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas inactive for 10 days or more). • Construction contractors will provide temporary wind fencing around sites being graded or cleared. • Trucks hauling dirt, sand, or gravel will be covered or will maintain at least 2 feet of freeboard in accordance with Section 23114 of the California Vehicle Code. • Construction contractors will install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off tires of vehicles and any equipment leaving the construction site. • Traffic speeds on all unpaved roads will be reduced to 15 mph or less. • Temporary traffic controls such as a flag person will be provided during all phases of construction to maintain smooth traffic flow. • Construction activities that affect traffic flow on the arterial system will be conducted during off-peak hours to the extent practicable. • The grading contractor will suspend all soil disturbance activities when winds exceed 25 mph or when visible dust plumes emanate from a site; disturbed areas will be stabilized if construction is delayed.			
AQ-3	Potential measures to reduce emissions of ozone precursors (ROG and NOx) and particulates (PM10 and PM2.5) associated with construction equipment exhaust include but are not limited to the following: • Use construction equipment rated by the EPA as having Tier 3 or higher exhaust emission limits. • Use diesel oxidation catalysts and catalyzed diesel particulate traps. • Maintain equipment according to manufacturers' specifications. • Restrict idling of construction equipment to a maximum of 5 minutes when not in use. • Install high-pressure fuel injectors on construction equipment vehicles. • Re-route construction trucks away from congested streets or sensitive receptor areas			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
AQ-4	Potential measures to reduce emissions of the ozone precursors (ROG) from architectural coatings include but are not limited to the following: • Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. • Systems for HVAC systems as far away from the existing air pollution sources as possible.			
AQ-5	If the development review identifies potential health risk associated with siting residences near existing pollutant sources, avoidance or minimization measures shall be developed that ensure that the health risk be reduced to a level below SCAQMD thresholds for health risk. Measures shall be specific to each project and be determined during project design and/or development review. Potential building design measures to reduce the health risk associated with development within proximity (i.e., within 500 feet) of busy roadways (e.g. I-210 and SR-2) include, but are not limited to, the following: • Plant vegetation, preferably tall and finely-needled trees, between receptor and roadway; • Construct wall barriers between receptor and roadway that reduce the line of sight between the potential receptors and pollutant sources; • Install only fixed windows; • Install a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency particulate air (HEPA) filters (MERV-13 or higher), and develop a maintenance plan to ensure the filtering system is properly maintained; and • Locate air intake			
AQ-6	**Avoidance and Minimization Measures for Construction Emissions.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the development review identifies construction emissions that exceed SCAQMD mass emission thresholds, avoidance or minimization measures shall be developed and implemented to ensure that emissions will be reduced below their respective thresholds. In addition to compliance with regulatory measures (including compliance with SCAQMD Rules and Regulations), the City shall require all new construction projects to incorporate all feasible mitigation where appropriate. Potential measures to reduce fugitive dust emissions include but are not limited to the following: • Active grading sites will be watered one additional time per day beyond that required by			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	Rule 403. • Contractors will apply approved nontoxic chemical soil stabilizers to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas inactive for 10 days or more). • Construction contractors will provide temporary wind fencing around sites being graded or cleared. • Trucks hauling dirt, sand, or gravel will be covered or will maintain at least 2 feet of freeboard in accordance with Section 23114 of the California Vehicle Code. • Construction contractors will install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off tires of vehicles and any equipment leaving the construction site. • Traffic speeds on all unpaved roads will be reduced to 15 mph or less. • Temporary traffic controls such as a flag person will be provided during all phases of construction to maintain smooth traffic flow. • Construction activities that affect traffic flow on the arterial system will be conducted during off-peak hours to the extent practicable. • The grading contractor will suspend all soil disturbance activities when winds exceed 25 mph or when visible dust plumes emanate from a site; disturbed areas will be stabilized if construction is delayed. In addition, potential measures to reduce emissions of ozone precursors (ROG and NO_x) and particulates (PM10 and $PM_{2.5}$) associated with construction equipment exhaust include but are not limited to the following: • Use construction equipment rated by the EPA as having Tier 3 or higher exhaust emission limits. • Use diesel oxidation catalysts and catalyzed diesel particulate traps. • Maintain equipment according to manufacturers' specifications. • Restrict idling of construction equipment to a maximum of 5 minutes when not in use. • Install high-pressure fuel injectors on construction equipment vehicles. • Re-route construction trucks away from congested streets or sensitive receptor areas • Potential measures to reduce emissions of the ozone precursors (ROG) from			

	Standard Mitigation Measures, Conditions and Requirements	Staff Monitor	Timing of Compliance	Date of Compliance
	architectural coatings include but are not limited to the following: • Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible.			
AQ-7	**Building Design Measures**. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the development review identifies potential health risk associated with siting residences near existing pollutant sources, avoidance or minimization measures shall be developed that ensure that the health risk be reduced to a level below SCAQMD thresholds for health risk. Measures shall be specific to each project and be determined during project design and/or development review. Potential building design measures to reduce the health risk associated with development within proximity (i.e., within 500 feet) of busy roadways (e.g., I-210 and SR-2) include, but are not limited to, the following: • plant vegetation, preferably tall and finely needled trees, between receptor and roadway; • construct wall barriers between receptor and roadway that reduce the line of sight between the potential receptors and pollutant sources; • install only fixed windows; • install a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency particulate air (HEPA) filters (MERV-13 or higher), and develop a maintenance plan to ensure the filtering system is properly maintained; and • locate air intake systems for HVAC systems as far away from the existing air pollution sources as possible.			
Biological Resources				
BIO-1	Habitat Assessment and Focused Surveys for Special-Status Species: Prior to the issuance of any grading, building, or other construction permit for undeveloped parcels (excludes previously developed parcels) in the Project area, a habitat assessment shall be conducted for the parcel to determine whether the potential exists for special-status species to occur. If the habitat assessment identifies potentially suitable habitat for threatened and endangered species, focused surveys shall be conducted by a qualified biologist to determine presence or absence. Early consultation with the wildlife agencies (i.e., USFWS, CDFG) shall be undertaken for ESA- and CESA-listed species to ensure			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	avoidance to the greatest extent feasible and appropriate "take" authorization. If threatened and endangered species are observed/detected, project-specific mitigation measures shall be developed to mitigate impacts on threatened and endangered species to below a level of significance. This shall apply to all projects if there is a potential to disturb habitat, including grading and other ministerial construction permits. Specific measures shall include, as appropriate: • Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of impacts on listed species. • The use of fencing or flagging to identify sensitive areas that support the listed species and to ensure that the areas are protected from direct and indirect impacts. • Implementation of noise reduction measures (e.g., noise attenuation structures) within habitats occupied by listed avian species, and noise monitoring during the breeding season. • Identification and transplantation of listed plant species populations in accordance with best practices. • Prohibition on construction activities during the breeding seasons for listed species such, as: • Arroyo toad: March 15 to July 31 • Least Bell's vireo: March 15 to September 15 • Willow flycatcher (all subspecies): March 15 to September 15 • Coastal California gnatcatcher: February 15 to August 31			
BIO-2	BIO-2: Birds Nest Avoidance: If construction activities occur between January 15 and August 31, a preconstruction survey (within 7 days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within or adjacent to the area proposed for development in order to avoid the nesting activities of breeding birds/raptors.			
BIO-3	If nesting activities within 200 feet of the proposed work area are not detected, construction activities may proceed. If nesting activities are confirmed, construction activities shall be delayed within an appropriate buffer from the active nest until the young birds have fledged and left the nest or until the nest is no longer active as determined by a qualified biologist.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	The size of the appropriate buffer shall be determined by a qualified biologist based on field conditions.			
BIO-4	Prior to the initiation of future development projects within the Project area that have the potential to adversely affect sensitive habitat including ministerial grading and other construction-related actions, a habitat assessment shall be conducted when warranted in areas undisturbed by prior development to determine whether sensitive natural communities (including riparian vegetation) are present. If the habitat assessment identifies sensitive natural communities, a biological report shall be prepared to address impacts on sensitive natural communities resulting from the proposed future project. The report shall identify mitigation measures to reduce all significant impacts to below a level of significance. Mitigation measures shall include, but are not limited to the following, as determined appropriate by a qualified biologist in consultation with the wildlife agencies. • Early consultation with the wildlife agencies (i.e., USFWS, CDFG) for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization. • Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of sensitive habitats. • The use of fencing or flagging to identify and avoid sensitive areas and to ensure that the areas are protected from direct and indirect impacts. • Appropriate siting of staging areas within developed or disturbed areas, ensuring such areas are outside of existing sensitive habitats. • Provision of mitigation at a minimum of a 1:1 ratio to ensure no net loss of sensitive habitat. Consultation with the wildlife agencies or professional best practices may result in higher ratios.			
BIO-5	If a habitat assessment identifies potential federal and/or state jurisdictional waters, a formal jurisdictional delineation shall be prepared. This document will map the jurisdictional waters present and overlay it on the grading footprint of the project, thereby allowing a calculation of the total impacts. If jurisdictional waters are to be affected, mitigation is required at a minimum 1:1 ratio, but coordination with United States Army Corps of Engineers (through the Section 404 process) and California Department of Fish and Wildlife (through the Section 1602 Streambed Alteration Agreement process) may determine a higher ratio is required. Mitigation will be achieved through a combination of in-kind			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	creation, restoration, and/or enhancement as determined to be appropriate for each site through consultation with the resource agencies. Mitigation will first be considered on site, then with an approved mitigation bank, and thirdly through offsite mitigation. The appropriate permit applications will be submitted to state and federal regulatory agencies. The permits issued by these agencies will finalize the mitigation requirements.			
BIO-6	If a habitat assessment identifies that a specific development project will interfere substantially with wildlife movement or established wildlife corridors, avoidance and minimization measures shall be developed that ensure the continued movement of wildlife through a specific corridor or area. Measures shall be specific to each project and be determined by a qualified biologist during project design; however, the following minimization measures shall be incorporated where appropriate, as determined by a qualified biologist: • Project design shall be sensitive to wildlife movement and, if a corridor is determined to be located on site, the project shall be designed to avoid segmentation of the corridor and the continued viability of the corridor. • Street lighting shall be designed such that it does not increase the overall ambient lighting and glare in the natural area. This may be accomplished by designing street lighting with internal baffles to direct the lighting towards the ground and so there is a zero side angle cut off to the horizon. • Potential noise, motion, and human intrusion impacts shall be minimized by incorporating setbacks, berms, or walls into the project design. Construction-related noise shall be mitigated consistent with the City's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be equipped with mufflers. • Plant species acceptable for the project's landscaping must not include any invasive species, as identified by the California Invasive Plant Council (http://www.cal-ipc.org/ip/inventory/index.php). • When culverts are included in a project design within areas known to be used as wildlife crossings, they shall be placed in locations suitable for use by wildlife and shall be sized and shaped such as to facilitate wildlife movement through the culvert.			
BIO-7	Prior to issuance of any building permit for a new structure or expansion of the footprint of			

	Standard Mitigation Measures, Conditions and Requirements	Staff Monitor	Timing of Compliance	Date of Compliance
	an existing structure no matter how small, or for the addition of a second story, grading permit, or permit for demolition, the applicant shall submit a tree plan to the City. The tree plan shall provide the following information and is subject to all provisions listed below: • The location of all protected trees as defined in Section 11.40 of the City Municipal Code. For all projects requiring discretionary City review, tree identification tags that correspond with the submitted plan shall be installed for field verification. For projects on non-residential property, all trees shall be indicated. • The plan shall show the location, size, and species of all trees to be removed, the reason for removal, and all trees to be retained. Any trees proposed for removal due to poor health or condition shall have the condition of the tree documented in a letter report prepared and signed by an arborist certified by the International Society of Arboriculture (ISA). • The plan shall show the existing and proposed grades, existing and proposed improvements, and septic tanks and utility lines located within 30 feet of potentially removed trees, retained trees, and trees to be planted. • During the construction phase, all applicants shall comply with tree protection guidelines as defined in Section 11.40.070 of the City Municipal Code. • The director of community development shall notify the applicant of the requirement to obtain a tree removal permit for those trees on the tree plan that are intended to be removed and which are subject to the provisions of the City Municipal Code. • Arborist review of the tree plan may be required per the determination of the director of community development or his/her designee.			
BIO-8	**Habitat Assessment and Focused Surveys for Special-Status Species.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to the issuance of any grading, building, or other construction permit for undeveloped parcels in the Project area, a habitat assessment shall be conducted for the parcel to determine whether the potential exists for special-status species to occur. If the habitat assessment identifies potentially suitable habitat for threatened and endangered species, focused surveys shall be conducted by a qualified biologist to determine presence or absence. Early consultation with the wildlife agencies (i.e., USFWS, CDFG) shall be undertaken for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance

	If threatened and endangered species are observed/detected, project-specific mitigation measures shall be developed to mitigate impacts on threatened and endangered species to below a level of significance. This shall apply to all projects if there is a potential to disturb habitat, including grading and other ministerial construction permits. Specific measures shall include, as appropriate:
	• Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of impacts on listed species.
	• The use of fencing or flagging to identify sensitive areas that support the listed species and to ensure that the areas are protected from direct and indirect impacts.
	• Implementation of noise reduction measures (e.g., noise attenuation structures) within habitats occupied by listed avian species, and noise monitoring during the breeding season.
	• Identification and transplantation of listed plant species populations in accordance with best practices.
	• Prohibition on construction activities during the breeding seasons for listed species such, as:
	  • Arroyo toad: March 15 to July 31
	  • Least Bell's vireo: March 15 to September 15
	  • Willow flycatcher (all subspecies): March 15 to September 15
	  • Coastal California gnatcatcher: February 15 to August 31
	If no threatened or endangered species are observed or detected during focused surveys, but potentially suitable habitat for non-threatened and non-endangered plant or wildlife species is present, a site-specific determination shall be made as to whether the potential impacts are significant based on the degree of threat and the size of the population/occupied habitat to be impacted. Focused surveys may be required in order to make a significance determination, depending on the species to be impacted and the size of the project. The measures described above shall be employed as appropriate.			

BIO-9	**Bird Nest Avoidance.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If construction activities occur between January 15 and August 31, a preconstruction survey (within 7 days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within or adjacent to the area proposed for development in order to avoid the			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	nesting activities of breeding birds/raptors. If nesting activities within 200 feet of the proposed work area are not detected, construction activities may proceed. If nesting activities are confirmed, construction activities shall be delayed within an appropriate buffer from the active nest until the young birds have fledged and left the nest or until the nest is no longer active as determined by a qualified biologist. The size of the appropriate buffer shall be determined by a qualified biologist based on field conditions.			
BIO-10	**Habitat Assessment/Biology Report.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to the initiation of future development projects within the Project area that have the potential to adversely affect sensitive habitat including ministerial grading and other construction-related actions, a habitat assessment shall be conducted when warranted in areas undisturbed by prior development to determine whether sensitive natural communities (including riparian vegetation) are present. If the habitat assessment identifies sensitive natural communities, a biological report shall be prepared to address impacts on sensitive natural communities resulting from the proposed future project. The report shall identify mitigation measures to reduce all significant impacts to below a level of significance. Mitigation measures shall include, but are not limited to the following, as determined appropriate by a qualified biologist in consultation with the wildlife agencies. • Early consultation with the wildlife agencies (i.e., USFWS, CDFW) for ESA- and CESA-listed species to ensure avoidance to the greatest extent feasible and appropriate "take" authorization. • Provision of a qualified biological monitor on site during all earth-disturbing activities to ensure avoidance of sensitive habitats. • The use of fencing or flagging to identify and avoid sensitive areas and to ensure that the areas are protected from direct and indirect impacts. • Appropriate siting of staging areas within developed or disturbed areas, ensuring such areas are outside of existing sensitive habitats. • Provision of mitigation at a minimum of a 1:1 ratio to ensure no net loss of sensitive habitat. Consultation with the wildlife agencies or professional best practices may result in higher ratios.			
BIO-11	**Formal Jurisdictional Delineation.** The following shall be incorporated into the General Plan			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	Policy Implementation Program or adopted by City ordinance: If the habitat assessment described in mitigation measure MM BIO-3 identifies potential federal and/or state jurisdictional waters, a formal jurisdictional delineation shall be prepared. This document will map the jurisdictional waters present and overlay it on the grading footprint of the project, thereby allowing a calculation of the total impacts. If jurisdictional waters are to be affected, mitigation is required at a minimum 1:1 ratio, but coordination with USACE (through the Section 404 process) and CDFG (through the Section 1602 Streambed Alteration Agreement process) may determine a higher ratio is required. Mitigation will be achieved through a combination of in-kind creation, restoration, and/or enhancement as determined to be appropriate for each site through consultation with the resource agencies. Mitigation will first be considered on site, then with an approved mitigation bank, and thirdly through offsite mitigation. The appropriate permit applications will be submitted to state and federal regulatory agencies. The permits issued by these agencies will finalize the mitigation requirements			
BIO-12	Avoidance and Minimization Measures for Wildlife Use. The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: If the habitat assessment described in mitigation measure MM BIO-3 identifies that a specific development project will interfere substantially with wildlife movement or established wildlife corridors, avoidance and minimization measures shall be developed that ensure the continued movement of wildlife through a specific corridor or area. Measures shall be specific to each project and be determined by a qualified biologist during project design; however, the following minimization measures shall be incorporated where appropriate, as determined by a qualified biologist: • Project design shall be sensitive to wildlife movement and, if a corridor is determined to be located on site, the project shall be designed to avoid segmentation of the corridor and the continued viability of the corridor. • Street lighting shall be designed such that it does not increase the overall ambient lighting and glare in the natural area. This may be accomplished by designing street lighting with internal baffles to direct the lighting towards the ground and so there is a zero side angle cut off to the horizon. • Potential noise, motion, and human intrusion impacts shall be minimized by incorporating setbacks, berms, or walls into the project design. Construction-related noise shall be mitigated consistent with the City's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	equipped with mufflers. • Plant species acceptable for the project's landscaping must not include any invasive species, as identified by the California Invasive Plant Council (http://www.cal-ipc.org/ip/inventory/index.php). • When culverts are included in a project design within areas known to be used as wildlife crossings, they shall be placed in locations suitable for use by wildlife and shall be sized and shaped such as to facilitate wildlife movement through the culvert.			
BIO-13	**Tree Plan.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to issuance of any building permit for a new structure or expansion of the footprint of an existing structure no matter how small, or for the addition of a second story, grading permit, or permit for demolition, the applicant shall submit a tree plan to the City. The tree plan shall provide the following information and is subject to all provisions listed below: • The location of all protected trees as defined in Section 4.26.030.A.l of the City Municipal Code. For all projects requiring discretionary City review, tree identification tags that correspond with the submitted plan shall be installed for field verification. For projects on non-residential property, all trees shall be indicated. • The plan shall show the location, size, and species of all trees to be removed, the reason for removal, and all trees to be retained. Any trees proposed for removal due to poor health or condition shall have the condition of the tree documented in a letter report prepared and signed by an arborist certified by the International Society of Arboriculture (ISA). • The plan shall show the existing and proposed grades, existing and proposed improvements, and septic tanks and utility lines located within 30 feet of potentially removed trees, retained trees, and trees to be planted. • During the construction phase, all applicants shall comply with tree protection guidelines as defined in Section 4.26.040 of the City Municipal Code. • The director of community development shall notify the applicant of the requirement to obtain a tree removal permit for those trees on the tree plan that are intended to be removed and which are subject to the provisions of the City Municipal Code. • Arborist review of the tree plan may be required per the determination of the director of community development or his/her designee. Said arborist shall be contracted and			

	Standard Mitigation Measures, Conditions and Requirements	Staff Monitor	Timing of Compliance	Date of Compliance
	managed by the City, and all fees incurred shall be the responsibility of the property owner.			
Climate Change				
CC-1a	**Climate Action Plan.** Within 24 months of adoption of the General Plan Update, the City shall prepare and adopt a Climate Action Plan (CAP) that, through its full implementation, will reduce emissions from the city to 15% below current levels. At a minimum, the CAP shall: • Quantify the 2020 reductions in GHG emissions using currently accepted methods. • Quantify the impact of state and federal GHG reduction measures on projected 2020 BAU emissions in the city. • Identify methods to reduce GHG emissions to a level that is 15% below recent (2006) levels by 2020. • Identify additional measures or modified General Plan Update policies as needed for incorporation into the CAP. • Require monitoring and reporting of GHG emissions. • Establish a schedule of actions for implementation through 2020. • Identify funding sources for implementation through 2020. • Identify a process to set a reduction goal for 2030 by 2020. • Adopt feasible, enforceable GHG reduction measures to be required of private activities by the City. • Update the CAP by 2020 to include reduction measures to achieve the adopted 2030 reduction goal.			
CC-1	**Climate Change Preparedness Plan.** The City shall work with local governments and regional planning agencies to develop a comprehensive plan for adapting to and preparing for the physical effects associated with climate change. The plan shall consider the following steps: • Scope the climate change impacts to major city sectors and buildings to prepare for climate change. • Identify planning areas relevant to climate change impacts.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	• Conduct a vulnerability assessment based on climate change projections for the region, the sensitivity of planning areas to climate change impacts, and the ability of communities to adapt to climate change impacts. • Conduct a risk assessment based on the consequences, magnitude, and probability of climate change impacts, as well as on an evaluation of risk tolerance and community values. • Establish a vision and guiding principles for climate-resilient communities and set preparedness goals in priority planning areas based on these guiding principles. • Develop, select, and prioritize possible preparedness actions. • Develop measures of resilience and use these to track the results of actions over time. • Review assumptions and other essential information to ensure that planning remains relevant to the most salient climate change impacts. To maximize effectiveness, the preparedness plan needs to be an ongoing commitment of the City. The first plan shall be completed and adopted no later than 5 years after the adoption of the General Plan Update and shall be updated at least every 5 years thereafter.			
Cultural Resources				
CUL-1	The evaluation shall be performed by a historian or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for Historic Preservation Professionals. The potentially historic building/structure shall be evaluated according to the NRHP criteria A–C and CRHR criteria 1–3.			
CUL-2	Projects that have the potential to impact archaeological resources shall obtain a qualified archaeologist and Native American consultant, if applicable, to conduct a pedestrian survey and records search to determine the potential for the project area to contain significant archaeological resources. A qualified archaeologist shall be a registered professional archaeologist and possess an advanced degree in archaeology, history, or a related discipline. The findings from the pedestrian survey and records search shall be included in a brief archaeological letter report. The report shall indicate whether the project area has a low, moderate, or high potential to contain prehistoric and historic archaeological resources. Projects characterized by no known resources and a low potential for unknown archaeological resources shall not involve any additional investigative work nor require any			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	mitigation related to archaeological resources.			
CUL-3	Projects in areas having known resources or a moderate to high potential for significant resources shall undergo test and evaluation to determine if potentially significant archaeological resources are present. A Native American consultant shall be retained for projects involving prehistoric or ethnohistoric resources. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.			
CUL-4	Monitoring during construction grading or trenching may be required if there is a potential for encountering subsurface cultural resources. This requirement would derive from the management recommendations of either the test and evaluation report or the data recovery report. When invoked, the project applicant must provide written proof that a qualified archaeologist and a Native American monitor, if applicable, have been retained to observe all earth-disturbing activities.			
CUL-5	Prior to beginning fieldwork on any new projects, the project applicant and their contractors and subcontractors shall be informed of their legal obligations in the event of the discovery of human remains during excavation or trenching. These obligations derive from the State of California Health and Safety Code Section 7050.5 and PRC 5097.98. The discovery of human remains or presumed human remains requires that the area of the discovery be protected from further disturbance and that an immediate call be made to the County Coroner. If the Coroner determines that the remains are prehistoric, the Coroner, and only the Coroner, is authorized to contact the Native American Heritage Commission. They, in turn, will determine and notify a Most Likely Descendent (MLD) from the local Native American community. Meaningful consultation between the MLD, qualified archaeologist, project applicant, and the City shall establish a Memorandum of Understanding detailing a			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	reasonable course of action that will reduce adverse impacts to a level less than significant. The Memorandum of Understanding and technical reports from the MLD and the qualified archaeologist shall be submitted and distributed as required.			
CUL-6	**Historic Building/Structure Evaluation**. Prior to future project approval and the issuance of any construction permit within the city, including but not limited to a demolition or building permit, and if research indicates that any onsite building(s) or structure(s) is 45 years or older, the applicant shall be required to conduct an evaluation of the onsite building(s) or structure(s) to determine if it is eligible for inclusion in the state or local historical registers as required by the City's adopted Historic Preservation ordinance. The evaluation shall be performed by a historian or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for Historic Preservation Professionals. The potentially historic building/structure shall be evaluated according to the NRHP criteria A–C and CRHR criteria 1–3. The historian/architectural historian shall consult with knowledgeable local groups and individuals, appropriate archives, and appropriate repositories in an effort to identify the original and subsequent owners as well as the architect and the builder to establish whether any of these individuals played important roles in local or regional history (criterion B). Additionally, the physical characteristics and condition of the building or structure shall be evaluated under criterion C, and those judged to possess "the distinctive characteristics of a type, period, region, or method of construction" shall be further assessed for integrity and context. The results of the archival research and field assessment shall be documented in an evaluation report. This report shall explicitly state whether the resource is eligible for either state or local historical registers and shall also make specific recommendations for mitigation as appropriate. The historian/architectural historian shall complete the necessary California Department of Parks and Recreation (DPR) site forms (minimally a Primary Record and a Building/Structure/Object Record, with others as required) and include them as an attachment to the report. Copies of the DPR site forms shall be submitted to the CHRIS. Properties found in the evaluation report to meet NRHP criteria A–C or CRHR criteria 1–3 shall be considered "historical resources" as defined in Section 15064.5 of the CEQA regulations. Significant effects on historical resources shall be avoided or mitigated by the lead agency and as recommended by a qualified historian or architectural historian in compliance with the City's adopted Historic Preservation ordinance.			
CUL-7	**Phase I Pedestrian Survey, Records Search, and Letter Report.** The following shall be			

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	incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to future project approvals and the issuance of any construction permits, including but not limited to a grading permit, future projects within the city that have the potential to impact archaeological resources shall obtain a qualified archaeologist and Native American consultant, if applicable, to conduct a pedestrian survey and records search to determine the potential for the project area to contain significant archaeological resources. A qualified archaeologist shall be a registered professional archaeologist and possess an advanced degree in archaeology, history, or a related discipline. The findings from the pedestrian survey and records search shall be included in a brief archaeological letter report. The report shall indicate whether the project area has a low, moderate, or high potential to contain prehistoric and historic archaeological resources. Projects characterized by no known resources and a low potential for unknown archaeological resources shall not involve any additional investigative work nor require any mitigation related to archaeological resources.			
CUL-8	**Phase II Testing and Evaluation and Data Recovery Plan.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Projects in areas having known resources or a moderate to high potential for significant resources shall undergo test and evaluation to determine if potentially significant archaeological resources are present. A Native American consultant shall be retained for projects involving prehistoric or ethnohistoric resources. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation, or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.			
CUL-9	**Project Construction Monitoring.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Monitoring during construction grading or trenching may be required if there is a potential for encountering subsurface cultural resources. This requirement would derive from the management recommendations of either the test and evaluation report or the data recovery report discussed in MM CUL-3.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	When invoked, the project applicant must provide written proof that a qualified archaeologist and a Native American monitor, if applicable, have been retained to observe all earth-disturbing activities. Any unexpected discoveries shall be treated in accordance with MM CUL-3.			
CUL-10	**Paleontological Monitoring.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.			
CUL-11	**Inform Construction Crew of Legal Requirements Pertaining to Discovery of Human Remains.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: Prior to beginning fieldwork on any new projects, the project applicant and their contractors and subcontractors shall be informed of their legal obligations in the event of the discovery of human remains during excavation or trenching. These obligations derive from the State of California Health and Safety Code Section 7050.5 and PRC 5097.98. The discovery of human remains or presumed human remains requires that the area of the discovery be protected from further disturbance and that an immediate call be made to the County Coroner. If the Coroner determines that the remains are prehistoric, the Coroner, and only the Coroner, is authorized to contact the NAHC. They, in turn, will determine and notify a MLD from the local Native American community. Meaningful consultation between the MLD, qualified archaeologist, project applicant, and the City shall establish a Memorandum of Understanding detailing a reasonable course of action that will reduce adverse impacts to a level less than significant. The Memorandum of Understanding and technical reports from the MLD and the qualified archaeologist shall be submitted and distributed as required.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
Geology and Soils				
GEO-1	Construction plans to be reviewed and approved pursuant to latest edition of the Los Angeles County Building Code and the State Seismic Hazards Mapping and Alquist-Priolo Earthquake Fault Zones Acts, if applicable.			
GEO-2	In accordance with the California Building Code, seismic structure design requirements will be based on the Seismic Design Category for the proposed structures, which is based on the Occupancy Category for the structure and on the level of expected soil modified seismic ground motion. The final determination of the Seismic Design Category will be made at the time of building plan submittal and review of a site-specific soils report.			
GEO-3	Construction plans to be reviewed and approved pursuant to latest edition of the Los Angeles County Building Code and the State Seismic Hazards Mapping Act, if applicable.			
GEO-4	For any hillside development qualifying as a project as defined by the Seismic Hazards Mapping Act, the City shall require preparation of a site-specific geotechnical investigation that includes an evaluation of landslide hazard. Reports shall be prepared by qualified, California-licensed professional personnel—geotechnical engineer (GE) and certified engineering geologist (EG)—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce recommendations of the site-specific geotechnical investigation via the building permit process and shall be responsible for proper implementation.			
GEO-5	For any new development in rangefront areas, the City shall require a site-specific assessment of risks related to landslide runout. The assessment shall be performed and reported by qualified, California-licensed professional personnel - GE and certified EG - and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce any recommendations of the report via the building permit process and shall be responsible for proper implementation.			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
GEO-6	All construction sites are required to implement Best Management Practices (BMPs) to control erosion, debris, and construction-related pollutants. Compliance with LCFMC Chapter 9.20 Low Impact Development Standards (http://qcode.us/codes/lacanadaflintridge/), CASQA Construction BMP Online Handbook (www.casqa.org/resources/bmp-handbooks), Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMP) Manual (www.dot.ca.gov/hq/construc/stormwater/manuals.htm)			
GEO-7	Obtain approval from LA County Public Health for conventional and non-conventional on-site wastewater treatment system, consistent with the LA County Local Agency Management Program. (http://www.publichealth.lacounty.gov/eh/docs/ep_lu_Lamp.pdf)			
GEO-8	Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility			
GEO-9	**City Earthquake Fault Zoning and Alquist-Priolo Act Requirements for Sierra Madre Fault.** The City shall work with staff of the California Geological Survey and/or qualified, state-licensed consultant personnel to: (1) determine if the portion of the Sierra Madre Fault Zone lies within city limits and, if so, (2) adopt as a city ordinance an Earthquake Fault Zone. The provisions of this ordinance shall be consistent with all relevant provisions of the Alquist-Priolo Earthquake Fault Zoning Act. The City shall thereby enforce Alquist-Priolo Act requirements for project proposals involving parcels within the new City-designated Earthquake Fault Zone for the Sierra Madre Fault			
GEO-10	**Ridge-Top Shattering Risk Assessment and Mitigation for Hillside Development.** The City shall amend its hillside development ordinance to require the mandatory geotechnical reports prepared for all hillside development consistent with General Plan Safety Element Policy 1.1.3 and implementing ordinances to include a site- and project-specific assessment of ridge-top shattering risks. If appropriate in the professional judgment of the geotechnical			

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	engineer and/or certified engineering geologist of record, the report shall also identify geotechnical measures to mitigate the hazard to the extent feasible.			
GEO-11	**Ordinances Implementing General Plan Update Policies Relevant to Landslide Hazards Reduction.** The City shall modify its existing Hillside Development Ordinance or establish new ordinances to require the following. • For any hillside development qualifying as a project as defined by the Seismic Hazards Mapping Act, the City shall require preparation of a site-specific geotechnical investigation that includes an evaluation of landslide hazard. Reports shall be prepared by qualified, California-licensed professional personnel—geotechnical engineer (GE) and certified engineering geologist (EG)—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce recommendations of the site-specific geotechnical investigation via the building permit process and shall be responsible for proper implementation. • For any new development in rangefront areas, the City shall require a site-specific assessment of risks related to landslide runout. The assessment shall be performed and reported by qualified, California-licensed professional personnel—GE and certified EG—and shall be independently peer reviewed by personnel with commensurate licensure. The City shall enforce any recommendations of the report via the building permit process and shall be responsible for proper implementation.			
Hazards and Hazardous Materials				
HAZ-1	Mitigation measures would be developed consistent with the requirements of the City of La Cañada Flintridge Building and Safety Division, the Los Angeles County Department of Public Health Department, and the State Department of Toxic Substances Control, where appropriate.			
HAZ-2	Projects shall be reviewed and approved by the LA County Fire Department in accordance with the latest adopted LA County Building and Fire Code requirements, including the provision of fire sprinklers, upgraded fire apparatus access and fire hydrants, as determined necessary for the project.			
HAZ-3	Projects identified as being subject to LA County Fire Department Fuel Modification			

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	requirements shall provide an approved Fuel Modification plan to the City prior to the issuance of a building permit and maintain landscaping in accordance with the approved plan.			
HAZ-4	**Phase I, Phase II, or Phase III Environmental Site Assessment Prior to Development of Sites Related to the Use, Transport, or Storage of Hazardous Materials Sites.** Prior to the issuance of any grading permits for any future project under the General Plan Update that would take place on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), or on a site that was previously occupied by a land use that used or generated hazardous materials or wastes, the project applicant shall complete a Phase I, II, or III Environmental Site Assessment (ESA), prepared by a Registered Environmental Assessor (REA). Any recommendations for remediation or further analysis, such as a Phase II or Phase III ESA, shall be implemented prior to issuance of any grading permit. If monitoring during construction is recommended, the project applicant shall provide a letter of verification to the Community Development Director, stating that an REA has been retained to implement the monitoring program during construction activities. The program shall detail the pollutants or evidence of pollutants whose presence is being monitored, as well as the actions to be taken should any pollutant or evidence of pollutant be uncovered. If such a pollutant or evidence of the pollutant is encountered during construction activities (e.g., grading, clearing, or demolition activities), it should be evaluated by an REA and handled in accordance with applicable environmental laws and regulations. 1. A Phase I ESA is required for the development or redevelopment of a property suspected of historically containing hazardous materials and shall include, but not be limited to the following: ▪ A comprehensive records search. ▪ Consideration of historical information. ▪ Onsite evidence of hazardous material use, storage, or disposal. ▪ A recommendation as to whether a Phase II soil testing and chemical analysis is required. 2. If the results of the Phase I ESA conclude that a Phase II ESA is necessary, the Phase II ESA shall include, but not be limited to, the following: ▪ A work plan that includes the number and locations of proposed soil/monitoring wells, sampling intervals, drilling and sampling methods, analytical methods, sampling rationale, site geohydrology, field screening methods, quality			

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	control/quality assurance, and reporting methods. Where appropriate, the work plan is approved by a regulatory agency such as the DTSC, RWQCB, or County HMD. ▪ A site-specific health and safety plan signed by a Certified Industrial Hygienist. ▪ Necessary permits for encroachment, boring completion, and well installation. ▪ A sampling program (fieldwork) in accordance with the work plan and health and safety plan. Fieldwork is completed under the supervision of a State of California registered geologist. ▪ Hazardous materials testing through a State-certified laboratory. ▪ Documentation, including a description of filed procedures, boring logs/well construction diagrams, tabulations of analytical results, cross-sections, an evaluation of the levels and extent of contaminants found, and conclusions and recommendations regarding the environmental condition of the site and the need for further assessment. A remedial action plan will be developed as determined necessary by the Principal Investigator. Contaminated groundwater will generally be handled through the NPDES/dewatering process. ▪ A disposal process, including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat the identified type of waste. 3. If hazardous materials are determined to be present, a Phase III ESA shall be prepared and the responsible party shall contact the local CUPA or applicable regulatory agency to oversee the remediation of the property in compliance with all applicable local, county, state, and federal laws. The property owner, developer, or responsible party shall be responsible for funding or securing funding for the site remediation and shall provide proof to the City that the site contaminants have been properly removed in compliance with all applicable laws and regulations prior to project development.			
HAZ-5	**Notification of Property Owners.** All property owners shall be noticed when purchasing or building a home in the WUI area that they have accepted that the areas have certain risks that make their property, homes, and safety susceptible to wildfires.			
Hydrology and Water Quality				

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HYD-1	Comply with the City's Stormwater Management ordinance (LCFMC Chapter 9.21) by preparing an Urban Stormwater Mitigation Plan (USWMP), which requires peak stormwater runoff rates from new development to not exceed predevelopment levels.			
HYD-2	All new developments shall be required to incorporate LID practices into their stormwater drainage plans. The incorporation of LID practices would include the following measures from CNE 1.2.2: (a) minimizing pollutant loading and changes in hydrology; (b) ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; (c) minimizing the amount of stormwater guided to impermeable surfaces; (d) maximizing percolation of stormwater into the ground where appropriate; (e) preserving wetlands, riparian corridors, and buffer zones; (f) establishing reasonable limits on the clearing of vegetation from a project site; and (g) requiring incorporation of structural and non-structural best management practices to mitigate projected increases in pollutant loads and flows to ensure that, during a wet weather event, all stormwater remains on site. The incorporation of BMPs such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens will minimize impacts on the groundwater basins by allowing stormwater to percolate into the groundwater basins.			
HYD-3	Implementation of all applicable and relevant BMP's.			
HYD-4	All developments subject requiring the issuance of a grading or building permit to prepare an Urban Storm Water Management Plan (USWMP). Implementation of the USWMP would require peak stormwater runoff rates from new development to not exceed predevelopment levels.			
HYD-5	**Low Impact Development (LID) Practices.** The following shall be incorporated into the General Plan Policy Implementation Program or adopted by City ordinance: All new developments shall be required to incorporate LID practices into their stormwater drainage plans. The incorporation of LID practices would include the following measures from CNE 1.2.2: (a) minimizing pollutant loading and changes in hydrology; (b) ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; (c) minimizing the amount of stormwater guided to impermeable surfaces;			

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	(d) maximizing percolation of stormwater into the ground where appropriate; (e) preserving wetlands, riparian corridors, and buffer zones; (f) establishing reasonable limits on the clearing of vegetation from a project site; and (g) requiring incorporation of structural and non-structural best management practices to mitigate projected increases in pollutant loads and flows to ensure that, during a wet weather event, all stormwater remains on site. The incorporation of BMPs such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens will minimize impacts on the groundwater basins by allowing stormwater to percolate into the groundwater basins.			
MM HYD-6	Sanitary Sewer Line. The City shall require that prior to issuance of permits for the development of existing vacant lands designated for residential and mixed-use uses, the City shall confirm that a wastewater treatment facility will treat the wastewater generated by the new development and that the new development will be connected to that facility.			
Noise				
NOI-1	Implementation of the following multi-part mitigation measures is required to reduce potential construction period noise impacts: • Noise Reducing Features. All noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. During operation, mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment. • Use of Electrical Equipment. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible. • Location of Equipment and Support Areas. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors. • Speed Limits. Construction site and access road speed limits shall be established and enforced during the construction period.			

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	• Signal Limits. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. • Use of Audio Equipment. No project-related public address or music system shall be audible at any adjacent receptor. • Resolution of Complaints. The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the City shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor. • The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e. idling in excess of 5 minutes) is prohibited. • The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists. • All on-site demolition and construction activities, including deliveries and engine warm-up, shall be restricted to the hours of 7:00 a.m. and 6:00 p.m. weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction, except emergency work, is not permitted on Sundays or holidays.			
NOI-2	Noise Study. The 60 dBA CNEL contour would be expected to increase approximately 158 feet for I-210 and 24 feet for SR 2. The 65 dBA CNEL contour could be expected to increase approximately 96 feet for I-210 and up to 128 feet for SR-2. The 70 dBA CNEL contour could be expected to increase approximately 55 feet for I-210 and up to 92 feet for SR-2. All three of these contours would increase due to ambient growth in Southern California. Therefore, pursuant to NE Policy 2.2.1 and NE Policy 2.2.5 of the proposed General Plan Update, the following requirements shall be incorporated into the General Plan Policy Implementation Program and made part of future noise studies and mitigation requirements: • Noise Reducing Features. All noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. During operation, mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	of equipment. • **Use of Electrical Equipment.** Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible. • **Location of Equipment and Support Areas.** Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors. • **Speed Limits.** Construction site and access road speed limits shall be established and enforced during the construction period. • **Signal Limits.** The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. • **Use of Audio Equipment.** No project-related public address or music system shall be audible at any adjacent receptor. • **Resolution of Complaints.** The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the City shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.			
Tribal Cultural Resources				
TCR-1	Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.			
TCR-2	Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the applicable Native American Tribe. A copy of the executed contract shall be submitted to the City of La Cañada Flintridge Community Development Department. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground			

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	disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the project site have little to no potential for impacting Tribal Cultural Resources.			
TCR-3	TCR-3: Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.			
Public Services				
PS-1	Payment of applicable impact fees. Large urban service area amendments, annexation, and Specific Plan areas may require additional mitigation measures such as the provision of land for new facilities.			
None or add in Draft Local CEQA Guidelines MM?				
Transportation				

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TR-1	Mitigation measures identified per the City's Traffic Impact Analysis Guidelines per the City Traffic Engineer or a qualified transportation engineering consultant, with agreement by the City's Traffic Engineer, on a project-by-project basis.			
Tribal Cultural Resources				
TCR-1	Monitoring during construction grading or trenching shall be required for projects that would excavate to a depth or 10 feet or more, or that propose a total cut amount of 1,000 cubic yards or more. When invoked, the project applicant must provide written proof that a qualified paleontologist has been retained to observe all earth-disturbing activities. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.			
TCR-2	Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the applicable Native American Tribe. A copy of the executed contract shall be submitted to the City of La Cañada Flintridge Community Development Department. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the project site have little to no potential for impacting Tribal Cultural Resources.			
TCR-3	Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be			

Standard Mitigation Measures, Conditions and Requirements		Staff Monitor	Timing of Compliance	Date of Compliance
	assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor. If a resource is determined significant based on the evaluation, the site shall be avoided or the qualified archaeologist and Native American consultant shall prepare a data recovery plan and/or require archaeological monitoring during excavation activities, as necessary. If avoidance is not possible, the data recovery or mitigation monitoring plan shall be tailored to the specific circumstances at the site and shall be designed to reduce project-level impacts on the resource to a level less than significant. Cultural materials recovered during test and evaluation or data recovery shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be contained in a technical report and the entire collection transferred to a federally recognized curation facility.			