

**Arcadia 6th Cycle HEU
Administrative Draft
INITIAL STUDY/NEGATIVE DECLARATION**

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1.0 INTRODUCTION

1.1 Project Overview

This Initial Study/Negative Declaration (IS/ND) was prepared by Kimley-Horn and Associates (Kimley-Horn) for the City of Arcadia (City) to assess whether there may be significant environmental impacts of future housing development on the candidate housing sites and of the other Project components described in Section 2.0 Project Description, associated with the proposed 6th Cycle Housing Element Update (HEU) Project (Project). The Project includes 7,222 candidate housing units within the City's boundaries; see **Appendix A: Candidate Housing Sites Inventory**. The candidate housing units are located within 751 sites, totaling approximately 512 acres. The Project area and candidate housing site locations are illustrated on **Exhibit 3: Map of Candidate Housing Sites**.

Per California Government Code (CGC) §§65580 – 65589.11, also referred to as the California Housing Law, jurisdictions are required to maintain and update Housing Elements within their General Plans. Furthermore, CGC §§65580–65589.8 require that jurisdictions evaluate their Housing Elements every eight (8) years. Currently, this regulation requires jurisdictions to update their Housing Element for the 2021 to 2029 6th Cycle Housing Element Update. The City is preparing an update for its Housing Element, which will include updated goals and policies intended to increase the City's housing potential to combat the growing housing scarcity in the State.

The HEU will provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all within the City. The HEU will be prepared to ensure the City establishes policies, procedures, and incentives in its land use planning and development activities that result in maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in the City. The Arcadia's HEU consists of four (4) sections, Chapters 5 and 10 of the Arcadia General Plan (2010), a Technical Background Section, and associated appendices. The HEU is intended to summarize the existing status of the City's communities, the City's existing housing strategy, and provide updated policies to be implemented for the 6th Cycle. To assist the State in mitigating its current housing crisis, in which residents are facing a shortage of housing units, the State Department of Housing and Community Development (HCD) Determines Regional Housing Needs Assessment (RHNA) for all the metropolitan planning organizations (MPOs) statewide. HCD approves and the Southern California Association of Governments (SCAG) adopts SCAG's RHNA allocation methodology for 196 jurisdictions in the SCAG region, which includes the City of Arcadia.

Based on SCAG's final adopted RHNA allocation in March 2020, the City's RHNA allocation was finalized as 3,214 dwelling units (DUs). This is broken down between each income category as:

- 1,102 units for very low-income households;
- 570 units for low-income households;
- 605 units for moderate-income households; and
- 937 units for above moderate-income households

This IS/ND was prepared consistent with the requirements of the California Environmental Quality Act (CEQA) on the basis that there was no substantial evidence that there may have significant environmental impacts on specific environmental areas. If a potentially significant impact may occur, the most appropriate mitigation measure(s) have been identified and would be applied to avoid or mitigate the potential impact to a level of less than significant.

1.2 Lead Agency

The lead agency is the public agency with primary responsibility for a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines §15051 establishes criteria for identifying the lead agency. In accordance with CEQA Guidelines §15051(b) (1), “the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” Pursuant to State CEQA Guidelines §15367 and based on the criterion above, the City of Arcadia is the lead agency for the proposed Project.

1.3 Purpose and Scope of the Initial Study

In accordance with CEQA (California Public Resources Code [PRC] §21000 et seq.) and its Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.), this IS/ND has been prepared to evaluate the potential environmental effects associated with the construction and operation of the Project.

Per State CEQA Guidelines, §15070, a public agency shall prepare or have prepared a proposed negative declaration or ND for a project subject to CEQA when:

- a) The initial study shows no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The initial study identifies potentially significant effects, but:
 - 1) Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - 2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.4 Environmental Resource Topics

This IS/ND evaluates the proposed Project’s impacts on the following resource topics:

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

1.5 Document Organization

This IS/ND is divided into the following sections:

Section 1.0: Introduction – This section describes the purpose and organization of the document.

Section 2.0: Project Description describes the whole of the Project in detail. It also identifies any other public agencies whose review, approval, and/or permits may be required.

Section 3.0: Initial Study Environmental Checklist and Evaluation – This section describes the environmental setting and overview for each of the environmental resource topics, using the City of Arcadia’s Form J: Initial Study. It evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” and “potentially significant impact” in response to the CEQA Appendix G: Environmental Checklist Form (Environmental Checklist).

Section 4.0: References: The section identifies resources used to prepare the initial study.

1.6 Permits and Approvals

Upon its adoption by the Arcadia City Council, the 6th Cycle Housing Element Update would serve as a comprehensive statement of City’s housing policy and program of actions to support those policies. The Project involves approval of the following City of Arcadia entitlement:

- General Plan Amendment for Housing Element adoption (GPA 21-02) to include the 6th Cycle Housing Element.

1.7 Summary of Findings

Section 3.0 of this document contains the Environmental Checklist (Arcadia Form J – Initial Study) that was prepared for the proposed Project pursuant to Appendix G of the State CEQA Guidelines. The Environmental Checklist indicates that the proposed Project would not result in significant impacts with the implementation of mitigation measures, as identified where applicable throughout this document.

1.8 Initial Study Review Process

The IS and a Notice of Intent (NOI) to adopt an ND will be distributed to responsible and trustee agencies, other affected agencies, and other parties for a 30-day public review period.

Written comments regarding this ND should be addressed to:

Lisa Flores – Planning & Community Development Administrator
240 West Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-6021
626-574-5445
lflores@ArcadiaCA.gov

Comments submitted to the City during the 30-day public review period will be considered and addressed prior to the adoption of the ND by the City.

1.9 Project Applicant(s)/Sponsor(s)

City of Arcadia
240 West Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-6021

2.0 PROJECT DESCRIPTION

2.1 Location

The City of Arcadia (City) is located in central Los Angeles County (County) in the northwest portion of the San Gabriel Valley (Valley). The City is bounded by the San Gabriel Mountains, the Angeles National Forest, and the City of Sierra Madre to the north, the City of Pasadena to the northwest, the City of Monrovia to the east and northeast, Temple City to the southwest, and unincorporated County communities to the west and southeast. Regional access to the City is provided via the Interstate 210 Freeway (I-210), which runs in an east-west direction through the northern portion of the City. The Interstate 605 Freeway (I-605), known as the San Gabriel River Freeway), runs in a north-south direction, is approximately 0.18 miles east of the City's southeastern edge. **Exhibit 1: Regional Map** depicts the City's location in a regional context, while **Exhibit 2: Local Vicinity Map** depicts the City in a local context.

This Initial Study considers candidate housing sites to accommodate 7,222 units within the City's boundaries. The proposed number of available candidate housing units exceeds the City's RHNA allocation of 3,214 by 4,008 units.; see **Appendix A: Candidate Housing Sites Inventory**. The candidate housing sites are comprised of 751 parcels totaling approximately 512 acres. The Project area and candidate housing site locations are illustrated in **Exhibit 3: Map of Candidate Housing Sites**. Solely for analysis purposes, the candidate housing sites identified in **Appendix A** have been assigned a numeric label, as depicted on **Exhibits 3 through 13**.

2.2 Environmental Setting

Physical Setting

Arcadia is located in the northwest portion of the Valley and in the central portion of Los Angeles County. The County covers an approximately 4,084-square-mile area in the Southern California region and the Valley covers approximately 400-square-mile area.¹ The Valley is bounded on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills.²

The City encompasses approximately 7,109 acres of land area or 11.1 square miles.³ As described above, the City is bordered by the San Gabriel Mountains, the Angeles National Forest, and the City of Sierra Madre to the north, the City of Pasadena to the northwest, the City of Monrovia to the east and northeast, Temple City to the southwest, and unincorporated County communities to the west and southeast.

¹ City of Arcadia. *General Plan Final Environmental Impact Report, November 2010*. Available at https://www.arcadiaca.gov/shape/development_services_department/planning___zoning/general_plan.php#outer-708. Accessed on October 15, 2021.

² Ibid.

³ Ibid.

The City is predominantly comprised of residential land uses, with other notable land uses including the Los Angeles Arboretum, Santa Anita Racetrack, Arcadia County Park, Westfield Santa Anita Mall, and Santa Anita Golf Course; as well as various commercial and industrial areas throughout the City.

Population

The 2010 Census reported the total population for the City to be 56,364 persons, which is higher than the neighboring City of Monrovia (to the east), but significantly lower than nearby jurisdictions, such as Pasadena (to the west) and El Monte (to the south); as shown in **Table 1: Population Growth (2010 – 2045)**. In addition to the data shown in **Table 1**, the California Department of Finance (DOF) estimated the total population for Arcadia to be approximately 57,660 persons in 2020.⁴ Therefore, from 2010 to 2020, the City's population increased by approximately 2.58 percent (or 1,456 persons). The Southern California Association of Governments (SCAG) compiled a Regional Growth Forecast using data and direction from multiple state entities to produce socio-economic estimates and projections at multiple geographic levels and in multiple years. The SCAG's 2020-2045 Regional Transportation Plan and Sustainable Communities (RTP/SCS) projected Arcadia's population to be 62,200 persons by 2045.⁵ Therefore, from 2020 to 2045, the City is expected to see an increase in population of 7.58 percent (or 4,380 persons), similar to the City of Pasadena's projected increase, but less than Cities of Monrovia and El Monte. **Table 1** shows the projected growth for Arcadia, the Cities of Monrovia, Pasadena, and El Monte, and the County of Los Angeles.

Table 1: Population Growth (2010 – 2045)

Jurisdictions	Population			Percent Change	
	2010 Actual ¹	2020 Estimate ²	2045 Projected ³	2010-2020	2020-2045
Monrovia	36,590	37,964	42,100	3.76%	10.90%
Pasadena	137,122	145,061	155,500	5.79%	7.20%
Arcadia	56,364	57,820	62,200	2.58%	7.58%
El Monte	113,475	116,876	137,500	3.00%	17.65%
Los Angeles County	9,818,605	10,135,614	11,674,000	3.23%	15.18%
Sources:					
¹ U.S. Census Bureau, 2010 Census of Population and Housing					
² DOF E-5 City/County Population and Housing Estimates 1/1/2020.					
³ SCAG Connect SoCal 2020-2045 Demographics and Growth Forecast (September 3, 2020).					

Housing

In 2020, the California Department of Finance (DOF) estimated a total of 21,237 housing units in the City. According to the DOF, the City's housing stock increased by 2.66 percent (551 housing units) between 2010 and 2020. Single-family detached housing units were the most common

⁴ California Department of Finance. *E-5 City/County Population and Housing Estimates with 2010 Census Benchmark, 1/1/2020*. Available at <https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>. Accessed on October 17, 2021.

⁵ Southern California Association of Governments (SCAG). Retrieved from *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*. Accessed on October 6, 2021.

housing type in Arcadia in 2020, comprising approximately 70.34 percent (or 14,939 units). **Table 2: Housing Units (2010-2020)** shows the increase in the number of housing unit comparison between the City of Arcadia and neighboring Cities of Monrovia, Pasadena, and El Monte, and the County of Los Angeles. Arcadia experienced a smaller increase when compared to Monrovia, Pasadena, and the County. However, the City had a higher increase in the number of housing units when compared to the City of El Monte.

Table 2: Housing Units (2010-2020)

Jurisdictions	Housing Units		Percent Change
	2010	2020 Estimate	2010-2020
Monrovia	14,473	15,084	4.22%
Pasadena	59,551	62,753	5.38%
Arcadia	20,686	21,237	2.66%
El Monte	29,069	29,588	1.79%
Los Angeles County	3,443,087	3,590,574	4.28%

Source: Department of Finance. May 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. <https://www.dof.ca.gov/forecasting/demographics/estimates/e-5/>.

Candidate Housing Sites

Every eight (8) years, SCAG prepares and designates Regional Housing Needs Allocation (RHNA) for each local jurisdiction. For the 2021-2029 planning period, Arcadia is required to meet the RHNA number of 3,214 housing units. The Housing Element is required to identify potential candidate housing sites by income category to meet the City's RHNA Allocation. The sites identified within the Housing Element represent the City's plan for housing at the designated income levels within the 6th housing cycle planning period. The identified sites are either residentially zoned at a minimum of 30 dwelling units per acre (du/ac) or within areas of focus identified by the City with supporting strategies to stimulate future housing growth.

To select the sites, the City evaluated candidate housing sites based on surrounding and existing on-site development to determine the extent to which on-site uses have the potential to redevelop within the planning period (2021-2029). The City identified 751 parcels within a variety of different residentially and non-residentially zoned areas. These 751 parcels have the capacity to accommodate up to approximated 7,222 total housing units, which includes 1,087 units under pipeline projects, 1,091 units within existing residentially zoned land, 385 projected accessory dwelling units (ADUs), and 4,748 units under rezone strategies. The candidate housing site inventory in **Appendix A** provides a breakdown of these housing sites.

General Plan

The Arcadia General Plan (Arcadia GP) and the Arcadia GP Environmental Impact Report (Arcadia GP EIR) were adopted and certified in November 2010. The Arcadia GP provides the City's long-range planning goals and policies for development within the City. The Arcadia GP is the City's vision for growth to 2035. Arcadia GP Chapters 2 through 9 include the necessary GP elements: Land Use and Community Design, Economic Development, Circulation and

Infrastructure, Housing, Resources Sustainability, Parks, Recreation, and Community Resources, Safety, and Noise.

The Land Use and Community Design Element establishes land use designations for the City. The existing land use designations for the identified candidate housing sites are described in **Table 3: Candidate Housing Sites - Existing General Plan Land Use Designations.**

Table 3: Candidate Housing Sites - Existing General Plan Land Use Designations

Land Use Designation	Description
Commercial (C)	<p>The Commercial designation with a 0.5 Floor Area Ratio (FAR) is intended to permit a wide range of commercial uses which serve both neighborhood and citywide markets. The designation allows a broad array of commercial enterprises, including restaurants, durable goods sales, food stores, lodging, professional offices, specialty shops, indoor and outdoor recreational facilities, and entertainment uses. Adjacent to Downtown, the Commercial designation is intended to encourage small-scale office and neighborhood-serving commercial uses that complement development in the Downtown Mixed-Use areas. While the land use designation provides the general parameters within which development must take place, the Zoning Code or other land use regulatory document specifies the type and intensity of uses that will be permitted in a given area. In the Downtown area, for example, where properties are designated Commercial, land use regulations might specify that restaurants and cafes are permitted, but secondhand stores are not. The Zoning Code and other regulatory documents also indicate permitted building height limits for specific properties. Maximum FAR – 0.50 (0.30 FAR for Santa Anita Park) Higher intensity overlays are applied to portions of Downtown along Santa Anita Avenue, Colorado Place, and Huntington Drive (1.0 FAR).</p> <p>Building Height: up to 48 feet in the Downtown area (including Santa Anita Avenue, Colorado Place, and Huntington Drive); up to 40 feet for commercial uses outside of Downtown</p>
Commercial (C 1.0)	<p>The Commercial designation that allows mixed-use development with a density of 80 du/acre and a 1.0 Floor Area Ratio (FAR) is within the City's Downtown area. This Commercial designation is intended to encourage a strong pedestrian-oriented environment that provides a variety of retail and service uses, restaurants, and neighborhood-serving commercial uses that complement development in the Downtown Mixed-Use areas. In order to provide the residential population that is required to support the uses in the downtown and around the Metro Gold Line transit station, residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. The Development Code and other regulatory documents also indicate permitted building height limits for specific properties. Maximum FAR – 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: Up to 80 du/ac - Maximum Height: Up to 60 feet</p>
Downtown Mixed Use (DMU)	<p>The Downtown Mixed-Use designation provides opportunities for complementary service and retail commercial businesses, professional offices, and residential uses to locate within the City's downtown. Downtown Mixed Use encourages the inclusion of a ground-floor, street-frontage commercial component, but is not required. Residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. Mixed commercial/office and residential tenancies and standalone commercial or office uses are allowed. However, exclusively residential buildings are not allowed. Development approaches encourage shared use of parking areas and</p>

Land Use Designation	Description
	<p>public open spaces, pedestrian travel ways, and interaction of uses within the district. Particular features that will define Downtown include public open space as an integral component of the Gold Line station, as well as any larger mixed-use or commercial developments. Guided by the policies and vision of the General Plan, a specific plan or subsequent zoning changes for Downtown will contain detailed development standards, infrastructure requirements, land use regulations, and implementation measures for coordinated development. Maximum FAR: 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: Up to 80 du/ac - Maximum Height: up to 60 feet</p>
<p>Mixed Use (MU)</p>	<p>The Mixed-Use designation provides opportunities for commercial and residential mixed-use development that takes advantage of easy access to transit and proximity to employment centers, and that provide complementary mixes of uses that support and encourage pedestrian activity. Mixed-use districts support commercial uses that integrate well with residential activity without creating conflicts. Development approaches encourage shared use of parking areas and public open spaces, pedestrian movement, and interaction of uses within a mixed-use district. Design approaches should minimize or limit curb cuts/driveways at the front of the development when rear or side egress options are available. Residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. Mixed commercial/office and residential tenancies and stand-alone commercial or office uses are allowed. However, exclusively residential buildings are not. Maximum FAR – 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: 22 -30 du/ac - Maximum Height: up to 40 feet</p>
<p>Medium Density Residential (MDR)</p>	<p>The Medium Density Residential designation accommodates varied housing types and sizes within a suburban neighborhood context. Permitted residential uses include detached and attached residences with private and/or shared yards and open space areas. Other uses that may be appropriate, consistent with zoning regulations, include public and private schools, public parks, and other open space uses. Unit Density: 6 to 12 du/ac Typical Population Density: 17-35 persons per acre</p>
<p>High Density Residential (HDR)</p>	<p>The High-Density Residential designation accommodates higher-density attached housing types for both renter and owner households within a neighborhood context. Such housing types generally are located near transit stops, along arterials and transit corridors, and within easy walking distance of shops and services. Appropriate transition to adjacent lower-density neighborhoods is required through the use of yards, other open areas, and building heights. Other uses that may be appropriate, consistent with zoning regulations, include public and private schools, public parks, and other open space uses. Unit Density: 12 to 30 du/ac - Typical Population Density: 34-86 persons per acre</p>
<p>Commercial/ Light Industrial (C/LI)</p>	<p>The Commercial/Light Industrial designation provides areas for a complementary mix of light manufacturing businesses, limited auto service and repair, and support office and retail uses. The designation recognizes the importance of small-scale industrial and quasi-industrial businesses for the community in terms of business start-ups/entrepreneurship, job provision, residents’ access to needed goods and services, and revenue from point-of-sales operations. Such uses are low scale, with development and operating conditions built into the development to minimize impact on surrounding uses. Permitted retail uses are limited to those that support the industrial businesses. Larger-scale commercial uses will be considered on a case-by-case basis in the Lower Azusa Road Reclamation area. Maximum FAR: 0.50</p>

Land Use Designation	Description
Open Space – Outdoor Recreation (OS-OR)	The Open Space–Outdoor Recreation designation encompasses all City, county, state, and federal parks and associated facilities, including private facilities on leased public lands. The designation identifies public lands intended to be used for active and passive recreational activities, such as parks, golf courses, trails, and the Arboretum. Public lands used as detention basins may also be designated Open Space – Outdoor Recreation when co-located with active recreational uses or when open spaces serve two uses, such as a sports field and a detention basin. Maximum FAR: N/A
Source: City of Arcadia. (2010). <i>City of Arcadia General Plan</i> . Chapter 2: Land Use and Community Design Element. Retrieved from: https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/general%20plan/Land%20Use%20Element%20Update%20Final.pdf . Accessed on October 15, 2021.	

Zoning

The City’s Zoning Code/Development Code (Arcadia DC) can be found in City of Arcadia Municipal Code (Arcadia MC) Article IX Chapter 1. The Arcadia DC’s intent is to regulate the use and development of land within the City, consistent with the Arcadia GP.⁶ The existing zoning for each of the candidate housing sites is specified in **Appendix A** and each zone is described below in **Table 4: Existing Zoning**.

Table 4: Candidate Housing Sites - Existing Zoning

Zone	Description
Commercial Manufacturing (C-M)	The C-M zone is intended to provide areas for a complementary mix of light manufacturing businesses, minor vehicle service and repairs, and support office and retail uses. A wide range of small-scale industrial and quasi-industrial uses with minimal impact to surrounding uses are appropriate. Retail uses are limited to business services, food service, and convenience goods for those who work in the area. Residential uses are not permitted in this zone. This zone implements the General Plan Commercial/Light Industrial designation.
Downtown Mixed Use (DMU)	The Downtown Mixed-Use zone is intended to provide opportunities for complementary service and retail commercial businesses, professional offices, and residential uses located within the City’s downtown. A wide range of commercial and residential uses are appropriate, oriented towards pedestrians to encourage shared use of parking, public open space, and interaction of uses within the zone. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site, and exclusive residential structures are not allowed. This zone implements the General Plan Downtown Mixed-Use designation.
General Commercial (C-G)	The C-G zone is intended to provide areas for retail and service uses, offices, restaurants, public uses, and similar and compatible uses. This zone implements the General Plan Commercial designation.
Specific Plan-Arroyo Pacific (SP-AP)	The purpose of the Arroyo Pacific Academy Specific Plan is to create an educational campus that is pedestrian-oriented and integrated with the surrounding area. More specifically, the Specific Plan creates a zone for a high school use on N. Santa Anita Avenue at the edge of Downtown Arcadia.

⁶ City of Arcadia. *Municipal Code Article IX Chapter 1 – Development Code*. Available at https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV1ENAPEN_S9101.01PUAPDECO Accessed on October 15, 2021.

Zone	Description
Commercial Business District (CBD)	The Commercial Business District zone is intended to promote a strong pedestrian-oriented environment and to serve community and regional needs for retail and service uses, professional offices, restaurants, public uses, and other similar and compatible uses. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site. This zone implements the General Plan Commercial designation.
Medium Density Residential (R-2)	The R-2 zone is intended to provide areas for a variety of dwelling types and accessory uses compatible with the residential use of the zone. Types of dwelling units include attached or detached single- unit and multi-unit homes and duplexes at a density of six to 12 dwelling units per acre. This zone implements is the General Plan Medium Density Residential designation.
High Density Residential Zone (R-3)	The R-3 zone is intended to provide areas for a variety of medium- to high-density residential development and accessory uses compatible with the residential use of the zone. Types of dwelling units include single unit attached, townhomes, condominiums, and apartment structures at a density of 12 to 30 units per acre. This zone implements the General Plan High Density Residential designation.
Mixed Use (MU)	The Mixed-Use zone is intended to provide opportunities for commercial and residential mixed-use development that takes advantage of easy access to transit and proximity to employment centers and encourages pedestrian activity. A wide range of integrated commercial and residential uses are appropriate. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site, and exclusive residential structures are not allowed. This zone implements the General Plan Mixed Use designation.
Professional Commercial (C-O)	The C-O zone is intended to provide sites for development as administrative, financial, business, professional, medical and governmental offices. This zone implements the General Plan Commercial designation.
Open Space – Outdoor Recreation (OS-OR)	The OS-OR zone is intended to provide areas to be used for active and passive recreational activities, such as parks, golf courses, trails, and the Los Angeles County Arboretum. This zone implements the General Plan Open Space-Outdoor Recreation designation.
Source: City of Arcadia. (2016). <i>City of Arcadia Development Code Title IX, Division 2</i> . Available at https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/development%20code/2021%20Update/Arcadia%20DevCode%20-%20Division%20%20Zones,%20Uses,%20and%20Standards%20-TA%207-19-2021.pdf . Accessed on October 15, 2021.	

2.3 Background

State Policy and Authorization

California State Housing Element Law (California Government Code Article 10.6), enacted in 1969, establishes the requirements for Housing Elements. California Government Code (CGC) §65583 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years. Additionally, the California Legislature identifies overall housing goals for the state to ensure every resident has access to housing and a suitable living environment.

Housing Element

Through the Housing Element, all California jurisdictions (cities and counties) are mandated to adequately plan to meet the housing needs of everyone in the community, regardless of economic status.⁷ State law requires each city and county to adopt a General Plan as a “blueprint” for its physical development. A General Plan is a key tool that addresses a variety of subject areas and expresses the community's development goals related to the jurisdiction’s future land uses. The Housing Element, one of seven State-mandated General Plan elements (i.e., Land Use, Housing, Circulation, Noise, Safety, Open Space, and Conservation), is prepared according to CGC §65583 requirements. California Government Code §65583 sets forth the specific content requirements of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs.

The City’s Housing Element is designated as Arcadia GP Chapter 5. Arcadia’s Housing Element was last adopted in 2013 for the 5th Cycle Update – 2013-2021 planning period. The City of Arcadia 6th Cycle Housing Element Update 2021-2029 (HEU or Project) is a comprehensive update to the 5th Cycle Update. The HEU is part of a new update cycle for jurisdictions within the SCAG region to allow for synchronization with SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Housing Element sets forth an eight (8) -year strategy to address the City’s identified housing needs, including specific implementing programs and activities. Some amendments have been made to Housing Element law since adoption of the City’s 5th Cycle Housing Element 2013-2021. These new statutory provisions change the Housing Element’s analysis reporting and policy requirements. The Project complies with these amendments to state housing law and all other federal, state, and local requirements.

Household Income

The California State Department of Housing and Community Development (HCD) has identified the following income categories based on the County of Los Angeles’ Area Median Income (AMI):

- Extremely Low-income: households earning up to 30 percent of the AMI
- Very Low-income: households earning between 31 and 50 percent of the AMI
- Low-income: households earning between 51 percent and 80 percent of the AMI
- Moderate Income: households earning between 81 percent and 120 percent of the AMI
- Above Moderate Income: households earning over 120 percent of the AMI

Lower income groups refer to extremely low, very low, and low-income groups. Arcadia’s household income characteristics can help identify housing types that would be affordable to the City’s population. Income characteristics assist in determining what housing types and

⁷ California Department of Housing and Community Development (HCD). Available at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>. Accessed on October 6, 2021.

characteristics are required to meet the population’s needs. **Table 5: Households by Income Category in Arcadia** shows that lower income categories represent 28.74 percent of Arcadia’s households, while moderate to above moderate-income households represent 71.26 percent.

Table 5: Households by Income Category in Arcadia

Income Category (Percent of County MFI)	Households	Percent
Extremely Low (30% AMI or less)	2,515	8.48%
Very Low (31 to 50% AMI)	2,115	7.63%
Low (51 to 80% AMI)	2,455	12.63%
Moderate or Above (over 80% AMI)	14,245	71.26%
Total	19,990	100.0%

Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Regional Housing Needs Assessment

As previously noted, CGC §65583 sets forth the specific content requirements of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs. Local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by HCD.

The City is a member agency of SCAG, who is responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region and therefore acts as the COG for San Bernardino County in this case. The RHNA is mandated by State Housing Law as part of the periodic process of updating local General Plan Housing Elements.⁸ It quantifies the housing need within each jurisdiction for all economic segments of the community (known as RHNA allocation plan) in four (4) income categories: very low, low, moderate, and above moderate.

Per CGC §65584(d), the RHNA allocation plan determines existing and projected housing need with the following objectives:

- Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.
- Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to CGC §65080.

⁸ Southern California Association of Governments (SCAG). *What is RHNA?* Available at <https://scag.ca.gov/rhna>. Accessed on August 10, 2021

- Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- Affirmatively furthering fair housing.

Each jurisdiction must demonstrate within its Housing Element that it can accommodate its RHNA allocation at all income levels. The California Department of Finance (DOF)'s population estimates and RHNA are also used for regional transportation planning purposes. Senate Bill (SB) 375 integrates RHNA with SCAG's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). In the past, the RHNA was undertaken independently from the RTP. However, in 2008, the California Legislature passed SB 375 as the land use and transportation planning component of the State's effort to reduce vehicle miles traveled (VMT) to achieve the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) GHG emission reduction. The law recognizes the importance of planning for housing and land use in creating sustainable communities where residents of all income levels have access to jobs, services, and housing by using transit, walking, or bicycling.

In addition, SB 166 ensures that jurisdictions at all times have sites available and identified in their Housing Elements to meet their RHNA allocation if unmet. In the event that at any time during the 6th Cycle planning period, the City does not have sufficient sites to meet their RHNA need, the City will be required to take remedial action by identifying and if necessary, rezoning, alternative sites to replace the ones not developed at the affordability or densities projected in the candidate housing sites inventory so that there is no net loss of residential unit capacity.

RHNA Allocation

As previously mentioned, RHNA allocates housing need based on future estimates of housing unit growth need over the RHNA planning period (2021-2029). The RHNA allocation plan identifies the projected number of housing units that will be needed to accommodate estimated future growth need during the planning period at specified levels of affordability.

On March 4, 2021, SCAG adopted the final RHNA allocations and distributed the RHNA allocation to all local jurisdictions. **Table 6: City of Arcadia 2021-2029 RHNA Allocation** provides the final RHNA allocation to the City. The City's projected housing need for the 6th Cycle planning period is 3,214 housing units, including 1,102 very low-income units and 570 low-income units.

Table 6: City of Arcadia 2021-2029 RHNA Allocation

Income Level	% of Average Median Income (AMI)	RHNA Allocation (Housing Units)
Very Low Income	<50%	1,102
Low-income	50-80%	570
Moderate Income	80-120%	605
Above Moderate Income	>120%	937
Total		3,214
Source: SCAG, 2021		

In accordance with State Housing law, local governments must be accountable for ensuring that projected housing needs can be fully accommodated at all times during the Housing Element planning period. The HEU provides a framework for evaluating the adequacy of local zoning and regulatory actions to ensure each local government is providing sufficient appropriately designated land throughout the planning period. The Housing Element must identify and analyze the City’s housing needs and establish reasonable goals, objectives, and policies based on those needs. The HEU must also identify candidate housing sites with the potential to accommodate housing at higher densities to meet the City’s assigned low-income RHNA (extremely low, very low and low-income) category need.

2.4 Project Characteristics

Housing Element Overview and Organization

The City of Arcadia is proposing the 6th Cycle Housing Element (2021–2029 planning period) as a comprehensive update to the City’s 5th Cycle (2013-2021) Housing Element. The City’s goal for the HEU Project is to achieve HCD certification of its 6th Cycle Housing Element. The Housing Element includes the City’s Housing Policy Plan in Chapter 10 of the Arcadia GP, which addresses the City’s identified housing needs, and includes goals, policies, and programs concerning housing and housing-related services, and the City’s approach to addressing its share of the regional housing need.

The City’s 6th Cycle Housing Element (2021-2029) has been prepared in compliance with State Housing Element law, contains the following components:

- **City of Arcadia General Plan Chapter 5: Housing Element**
- **City of Arcadia General Plan Chapter 10: Implementation Plan**
- **Technical Background Report:**
 - **Section 1: Introduction** contains a summary of the Housing Element’s content, organization, and statutory considerations;

- **Section 2: City of Arcadia Community Profile** contains analysis of the City's population, household and employment base, and the characteristics of the housing stock;
- **Section 3: Housing Constraints, Resources, and Affirmatively Furthering Fair Housing (AFFH)** examines governmental and non-governmental constraints on housing production, maintenance, and affordability and summarizes housing resources, including identification of housing sites, and funding and financial considerations
- **Section 4: Review of Past Performance** reviews and evaluations the City's housing project and program performance from the 5th Cycle (2013-2020 Planning Period).
- **Appendices:**
 - Appendix A: Adequate Sites
 - Appendix B: Community Engagement Summary
 - Appendix C: Glossary of Housing Terms

Candidate Housing Sites Inventory

To demonstrate the availability of sites, the City completed a land inventory that identifies potential candidate housing sites with capacity to accommodate the 2021-2029 RHNA allocation. These sites represent the City's plan for housing at the designated income levels within the 6th housing cycle planning period (2021 – 2029) and are either residentially zoned at a minimum of 30 du/ac or are within areas of focus identified by the City with supporting strategies to stimulate future housing growth. It should be noted that while all the candidate sites were found to be suitable for future housing development, the HEU does not necessitate or directly propose the full development of the identified candidate sites, especially those beyond the established RHNA allocation for the City.

Through the analysis of existing residentially zoned sites and non-residentially zoned sites, the City has identified the following categories of properties to accommodate the 6th Cycle RHNA:

- 23 existing residentially zoned parcels at their existing densities
- 30 parcels as part of the Downtown Mixed Use expansion strategy
- 75 parcels as part of the Downtown Mixed Use residential flex overlay implementation strategy
- 106 parcels as part of the Mixed Use Upzone strategy
- 31 parcels as part of the Las Tunas Residential flex overlay implementation strategy
- 26 parcels as part of the Live Oak residential flex overlay implementation strategy

- 76 parcels as part of the C-G residential flex overlay implementation strategy
- 355 parcels as part of the High Density Residential (R-3) Upzone strategy
- The Arcadia Golf Course site

The City has identified a total of 751 parcels within a variety of different residentially and non-residentially zoned areas that have the capacity to accommodate up to approximately 7,222 total housing units. **Appendix A** provides a comprehensive inventory of the candidate housing sites. Each site is identified by assessor parcel number (APN) and a unique identifier. **Table 7: Summary of RHNA Status and Sites Inventory** identifies the City’s 2021-2029 RHNA by income category that meet the RHNA allocation.

Table 7: Summary of RHNA Status and Sites Inventory (Housing Units)

	Very Low Income	Low Income	Moderate Income*	Above Moderate Income	Total
RHNA (2021-2029)	1,102	570	605	937	3,214
	1,672				
Unit Capacity on Site Inventory					
Pipeline Projects	26		80	981	1,087
Existing Residentially Zoned Land	277		112	702	1,091
Accessory Dwelling Unit Projection	202		6	88	296
Total Existing Capacity	303		192	1,683	2,178
Total Existing Capacity plus ADUs	443		198	1,771	2,474
Remaining Unmet RHNA	1,167		407	--	1,574¹
Focus Areas					
Downtown Mixed-Use	375		148	960	1,483
Mixed-Use Upzone	124		51	302	477
Live Oak Residential Flex	203		82	509	794
C-G Residential Flex	252		100	640	992
R-3 Upzone	213		84	513	810
Arcadia Golf Course	48		72	72	192
Total Potential Development Capacity with Focus Areas	1,215		669	4,184	4,748
Total Potential Development Capacity	1,658		866	5,979	7,222
Sites Surplus/Shortfall	48		130	3,830	+4,008
Percentage Buffer	3%		22%	409%	125%
¹ The total remaining unmet RHNA is calculated from the remaining unmet Very Low, Low, and Moderate income units. Above Moderate Income inventory was not included in this calculation.					

Table 7 demonstrates the capacity to accommodate up to a total of 7,222 candidate housing units through existing capacity, which includes 1,087 units under pipeline projects and 1,091 units within existing residentially zoned land, 296 projected ADUs, and 4,748 units within Focus Areas. **Exhibit 3** depicts the candidate housing sites identified for future housing development, as facilitated by Project implementation. The City has identified candidate sites that yield 7,222 potential housing units within the City, which exceed the total required RHNA growth need of 3,214 housing units and results in a surplus of 4,008 housing units or 125 percent.

Projects in the Pipeline

The City has identified a number of projects currently in, or that have completed the entitlement process. These projects are likely to be developed and/or first occupied during the planning period and count as credit towards the 2021-2029 RHNA allocation. As shown in **Table 7**, the City has currently identified 28 parcels with a planned development of 1,087 units, 26 of 1,087 units will be affordable to Low and Very Low-income households.

Redevelopment of Nonvacant Sites for Residential Use

The City of Arcadia does not have sufficient vacant land available to accommodate 50 percent of the low/very-low income RHNA. To accommodate the need at all income levels, the City has analyzed sites that currently permit residential development. As part of the candidate housing sites analysis, the City has evaluated recent projects that have redeveloped on non-vacant sites to include residential units. The City has also conducted a parcel specific analysis of existing uses for each of the identified sites. This analysis is based on existing use data and other information that can be found through online research. As part of the site selection process, the City identified 23 parcels to accommodate a total of 1,091 units, 277 of 1,091 units can accommodate Low and Very Low-income households.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are housing units which may be developed in addition to an existing single- or multi-family residential use. These housing units can be free-standing or attached to a primary structure and provide additional housing on an existing residential lot. Other ADUs provide housing for family members or are rented to members of the community. In accordance with State Law, ADUs are allowed in all zones that allow single dwelling unit or multiple dwelling unit development. Junior Accessory Dwelling Units (JADUs) are permitted only in single dwelling unit zones.

The City of Arcadia has determined based on past performance that it is appropriate to anticipate the development of 296 accessory dwelling units from 2021 to 2029. To facilitate the development of ADUs available for lower income households, the City has developed relevant policies and programs as contained in Arcadia GP Chapter 10: Implementation Plan. The City has allocated 202 ADUs to Low- and Very-Low Income, 88 ADUs to Above Moderate Income, and six

ADUs to Moderate Income categories. To assist the City's ADU development projections, Arcadia has included **Housing Program 5-12**, which explores actions the City will take to promote and monitor the development of ADUs during the planning period.

Selection of Sites to Accommodate Remaining Need

In addition to sites that can accommodate housing at their existing capacity, the City identified six (6) Focus Areas that would benefit from residential development to apply strategies such as upzoning and rezoning to achieve the remaining unmet RHNA. These six (6) Focus Areas are (1) Downtown Mixed-Use Expansion and Overlay, (2) Mixed-Use Upzone, (3) Live Oak Corridor, (4) C-G Residential Flex Overlay, (5) R-3 Upzone, and (6) Arcadia Golf Course.

(a) Downtown Mixed-Use Expansion & Overlay

The City has identified properties zoned as General Commercial and Commercial Manufacturing in and adjacent to Downtown Arcadia. These properties provide an opportunity to introduce high density residential flex overlays and Downtown Mixed-Use zoning that are compatible with adjacent Central Business District and Downtown Mixed-Use zoned parcels. The existing Central Business District and Downtown Mixed-Use zoned currently allow up to 80 units per acre in conjunction with a commercial development and other uses that will support residential development.

These parcels were identified due to dilapidated commercial uses and at an assumed density of 64 du/ac, the assumed capacity of these sites is projected at 1,480 units, 374 of which are projected to develop affordably for Low and Very Low-income households. **Exhibit 4: Downtown Mixed-Use Expansion** and **Exhibit 5: Downtown Mixed-Use Overlay** show the candidate housing sites identified within the Downtown Mixed-Use Focus Area which can help accommodate a portion of the City's RHNA allocation.

Mixed-Use Upzone

The City has identified parcels in the Mixed-Use zone that have the potential to accommodate 477 units of development at an assumed density of 50 du/acre, 124 of which are projected to develop affordably. **Exhibit 6: Map of Site Inventory - Mixed Use Upzone (1)** and **Exhibit 7: Map of Site Inventory - Mixed Use Upzone (2)** show the candidate housing sites identified within the Mixed-Use Focus Area.

(b) Live Oak Corridor

The City has identified the Live Oak Corridor as an opportunity to both increase density and introduce residential density on viable commercial properties. The adjacent Mixed-Use zoning and access to transit supports the increase of residential uses in the corridor. The City identified two opportunities based on adjacent use and densities to introduce Residential Flex Overlays on

commercial properties within the corridor. The two opportunity areas, referred to as Las Tunas Residential Flex Overlay and Live Oak Residential Flex Overlay, have the total capacity to accommodate up to 794 units, as shown on **Exhibit 8: Map of Site Inventory – (Live Oak Corridor) Residential Flex Overlay**.

(i) Las Tunas Residential Flex Overlay

The City identified parcels west of Santa Anita Avenue, along Las Tunas suitable for higher density development. The identified parcels within the Las Tunas Residential Flex Overlay have the capacity to accommodate up to 609 units of development at an assumed density of 48 du/acre.

(ii) Live Oak Residential Flex Overlay

The City identified parcels east of Santa Anita Avenue, along Live Oak Avenue suitable for higher density development. The identified parcels within the Live Oak Residential Flex Overlay have the capacity to accommodate up to 118 units of development at an assumed density of 40 du/acre.

(c) C-G Residential Flex Overlay

The City has identified General Commercial zoned properties as a redevelopment opportunity where underutilized, smaller scale commercial development can transition to support residential development. The identified parcels have the capacity to accommodate 992 units of development at an assumed density of 24 du/acre, as shown on **Exhibit 9: Map of Site Inventory – C-G Residential Flex Overlay**. An assumption of approximately 50% redevelopment has been applied considering development history, economic factors, and AFFH requirements. In addition, the 80% redevelopment limit would preserve commercial zoned parcels to maintain a commercial base throughout the City.

(d) R-3 Upzone

The R-3 Zone has been identified by the City as an area with the opportunity to support increased density that is compatible with adjacent higher density residential uses and other uses that support residential development. Higher density within this Focus Area can be expected to accommodate lower income units. The identified parcels within the Sites Inventory have the capacity to accommodate 810 units of development at an assumed density of 32 du/acre, as shown on **Exhibit 10: Map of Site Inventory – R-3 Upzone (1)**, **Exhibit 11: Map of Site Inventory – R-3 Upzone (2)**, and **Exhibit 12: Map of Site Inventory – R-3 Upzone (3)**. An assumption of approximately 25% redevelopment has been applied considering development history, economic factors, and AFFH requirements.

Arcadia Golf Course

The City has identified the Arcadia Golf Course as a site to accommodate residential units across all of the income categories. As shown on **Exhibit 13: Map of Site Inventory – Arcadia Golf**

Course, the Arcadia Golf Course is approximately 25.86 acres in size and has the capacity to accommodate up to 192 units. However, future development of the Arcadia Golf Course may not generate the full 192 units due to the intention of retaining a portion of the site for open space and recreation uses.

(e) Goals and Policies

As required by State Housing Element law, the proposed Project includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA. The plan would implement strategies and programs intended to address the City's housing needs and meet the City's current housing goals, which are:

Housing Goal #1: Preservation, conservation, and enhancement of existing housing stock and residential neighborhoods within Arcadia.

Housing Goal #2: Provide suitable sites for housing development to accommodate a range of housing for residential use that meet the City's RHNA growth needs for all income levels.

Housing Goal #3: A range of housing choices for all social and economic segments of the community, including housing for persons with special needs.

Housing Goal #4: Mitigated governmental and non-governmental constraints to housing production and affordability.

Housing Goal #5: Equitable and fair housing opportunity in the City's housing market.

The goals listed above are described throughout the Arcadia GP Chapter 5: Housing Element with accompanying policies and programs to achieve them. The goals and policies are provided in their entirety in Plan to The Housing Element Update (see Appendix A).

(f) Implementation Programs

The Implementation Programs proposed to implement each goal and policy are included in their entirety in the Arcadia GP Chapter 10: Implementation Plan and Housing Element.

Housing Program 5-1: Home Rehabilitation

Housing Program 5-2: Code Enforcement

Housing Program 5-3: Residential Design Guidelines

Housing Program 5-4: Prevention of At-Risk Units

Housing Program 5-5: Preservation of Middle-Income Housing through New Housing Authorities

Housing Program 5-6: Residential Sites Inventory

Housing Program 5-7: Establish and Overlay to Permit Residential

Housing Program 5-8: Expansion of the Downtown Mixed-Use Area to Permit Residential Use

Housing Program 5-9: Expand and Update the Residential Flex Mixed Use Overlay in the Live Oak Corridor

Housing Program 5-10: Encourage Development of Housing Sites Listed in Inventory

Housing Program 5-11: Housing Density Bonus

Housing Program 5-12: ADU and JADU Incentive and Monitoring

Housing Program 5-13: Candidate Sites Used in Prior Housing Element Planning Cycle

Housing Program 5-14: Inclusionary Housing Policy

Housing Program 5-15: Lot Consolidation Incentives

Housing Program 5-16: Preservation of Rental Opportunities

Housing Program 5-17: Public Information About Affordable Housing

Housing Program 5-18: Emergency Shelters, Transitional, and Supportive Housing

Housing Program 5-19: Participation in the San Gabriel Valley Housing Trust

Housing Program 5-20: SB 35 Streamlining

Housing Program 5-21: Section 8 Housing Choice Voucher Program

Housing Program 5-22: Affordable Housing for Families and Persons with Special Needs

Housing Program 5-23: Homeless Program Assistance

Housing Program 5-24: Housing Sustainability

Housing Program 5-25: Fair Housing

Housing Program 5-26: Fair Housing Assistance

Housing Program 5-27: Supportive Housing/Low Barrier Navigation Centers

Housing Program 5-28: Water and Sewer Service Providers

2.5 Development Capacity Projections for Future Site Development

State CEQA Guidelines § 15378(a) defines a “project” as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” The proposed HEU Project does not propose new residential or other development on the 751 candidate sites evaluated in this IS/ND; rather, it provides capacity for future development consistent with State law. Future development would occur on these sites in incremental phases over time depending upon

numerous factors such as market conditions, and economic and planning considerations, and at the individual property owners' discretion. Additionally, future development facilitated by the proposed HEU Project would be required to undergo environmental review and evaluation under CEQA and other applicable federal, state and local regulations as each project is proposed.

2.6 Project Approvals

The City is the Lead Agency under CEQA and is responsible for reviewing, approving, and adopting this IS/ND. The City will consider the following discretionary approvals for the Project:

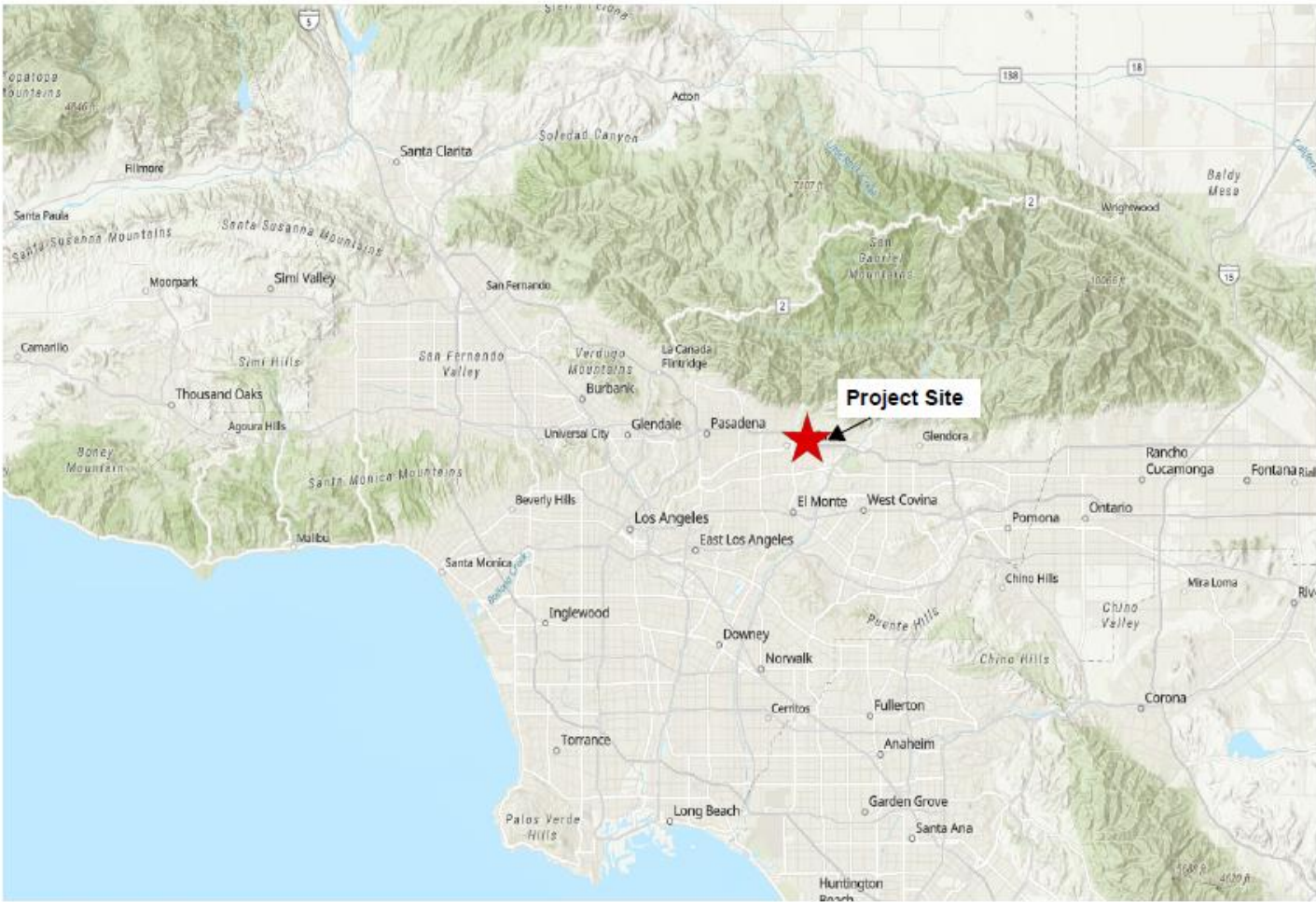
- Adoption of the 6th Cycle Housing Element Update (2021-2029)

The Project additionally requires the following approval from HCD following the City's final adoption of the 2021-2029 Housing Element Update:

- Review of the draft 2021-2029 Housing Element Update to determine compliance with state law and submittal of written findings to the City.

No discretionary approvals from other agencies are required.

Exhibit 1: Regional Map



Source: ESRI World Imagery, 2021.

EXHIBIT 1: Regional Map
Arcadia 6th Cycle HEU, City of Arcadia



Exhibit 2: Vicinity Map

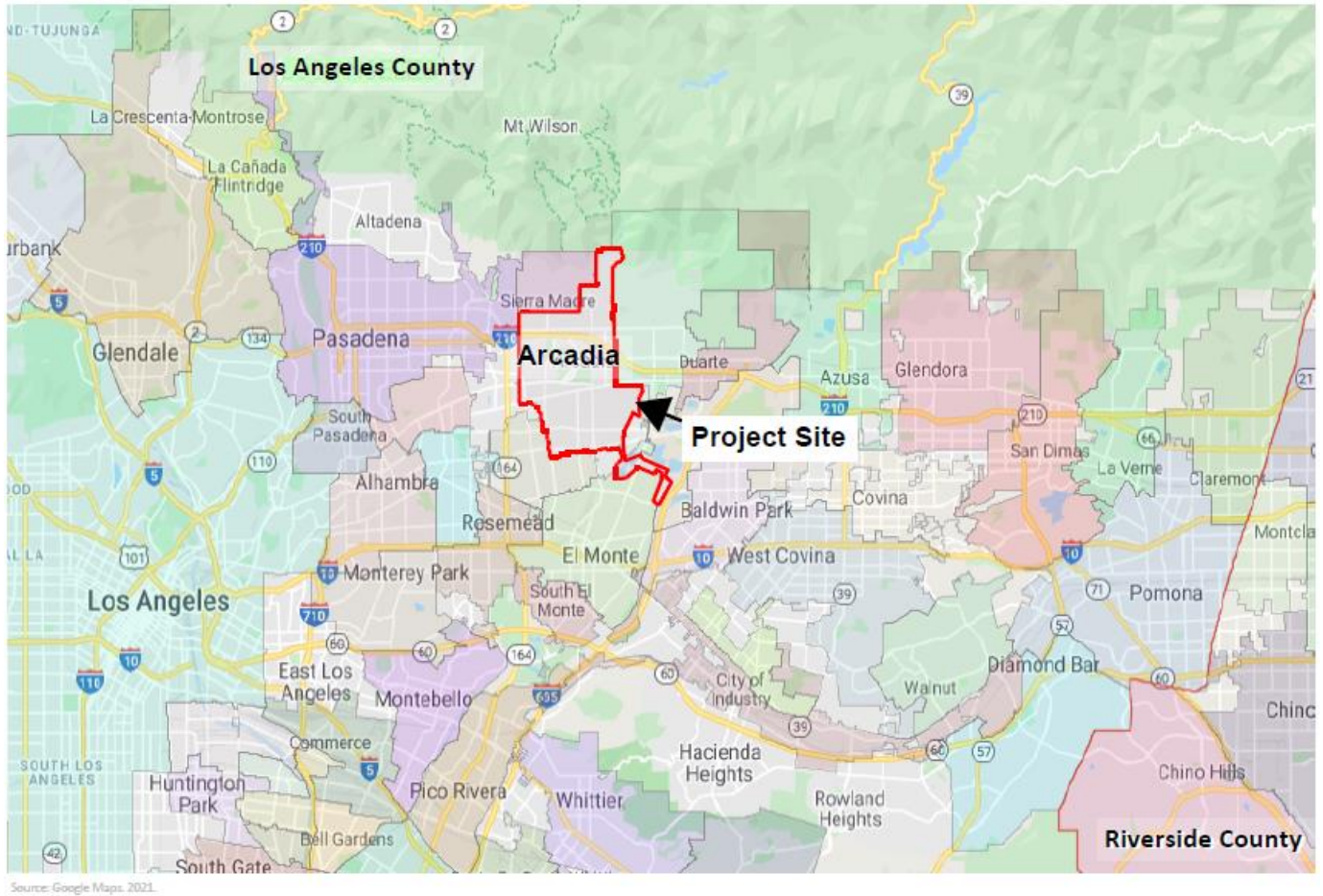


EXHIBIT 2: Vicinity Map
Arcadia 6th Cycle HEU, City of Arcadia



Exhibit 3: Map of Candidate Housing Sites

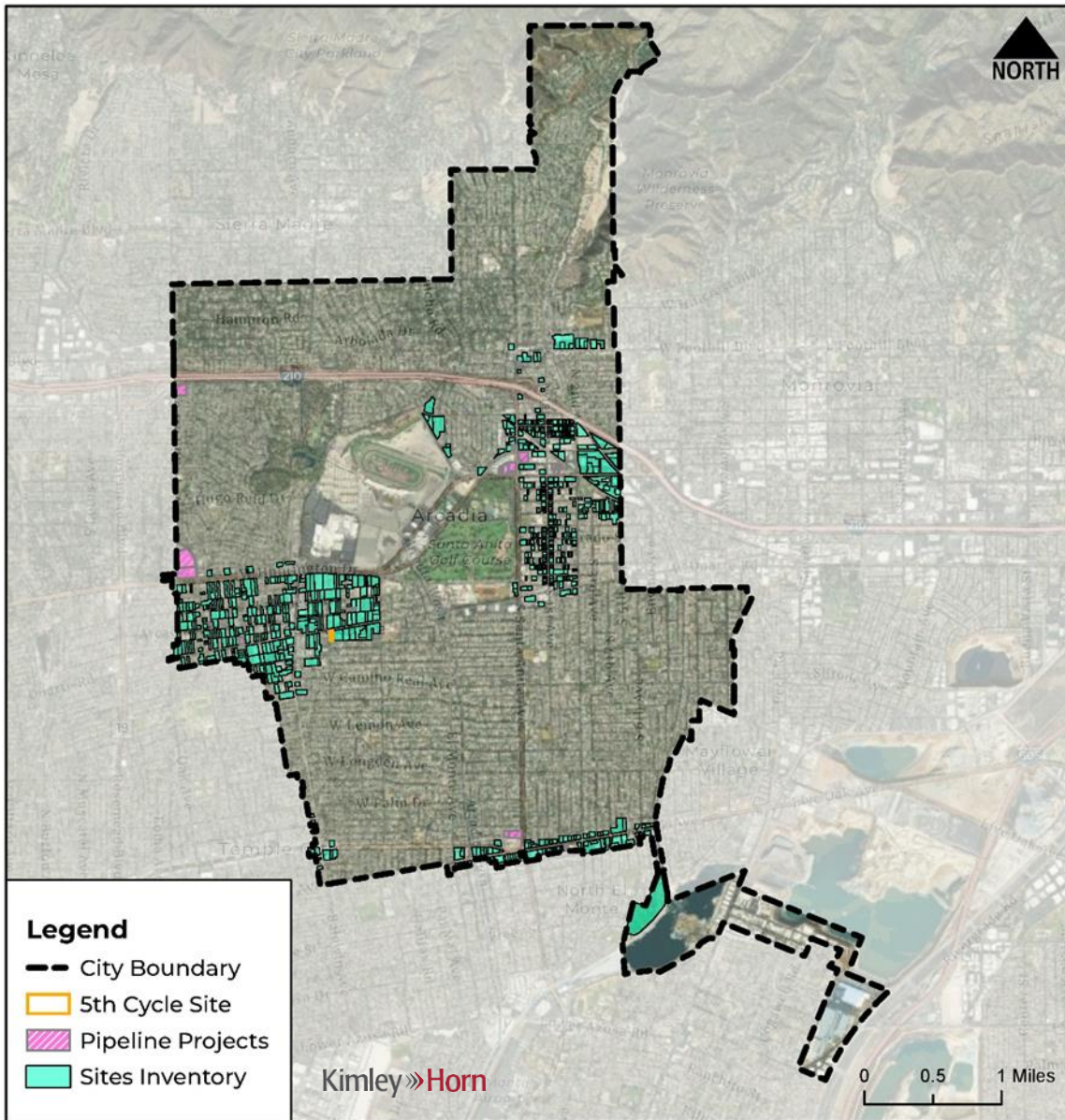


Exhibit 4: Map of Downtown Mixed-Use Expansion

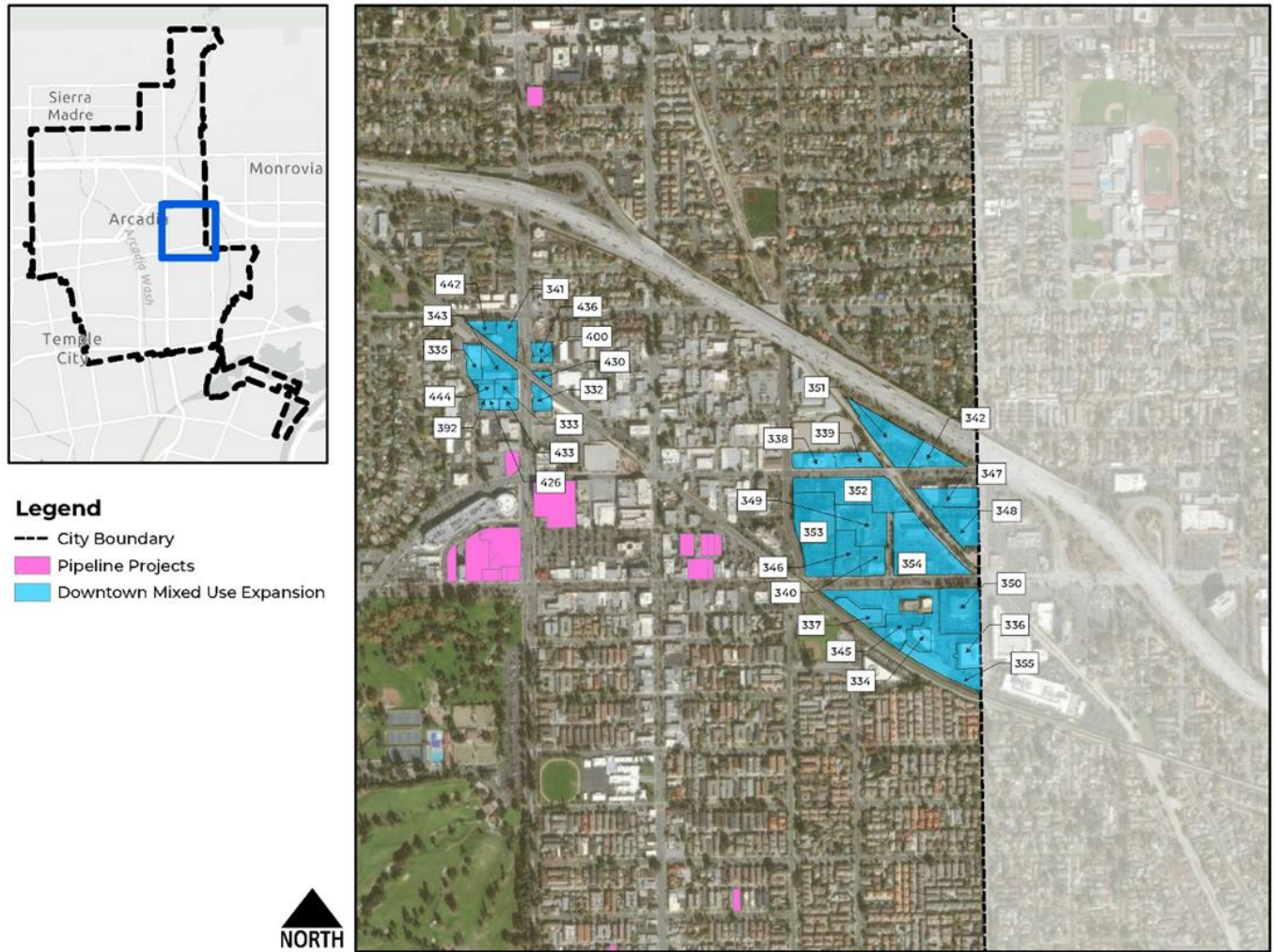


Exhibit 5: Map of Downtown Mixed-Use Overlay



Exhibit 6: Map Site Inventory – Mixed-Use Upzone (1)

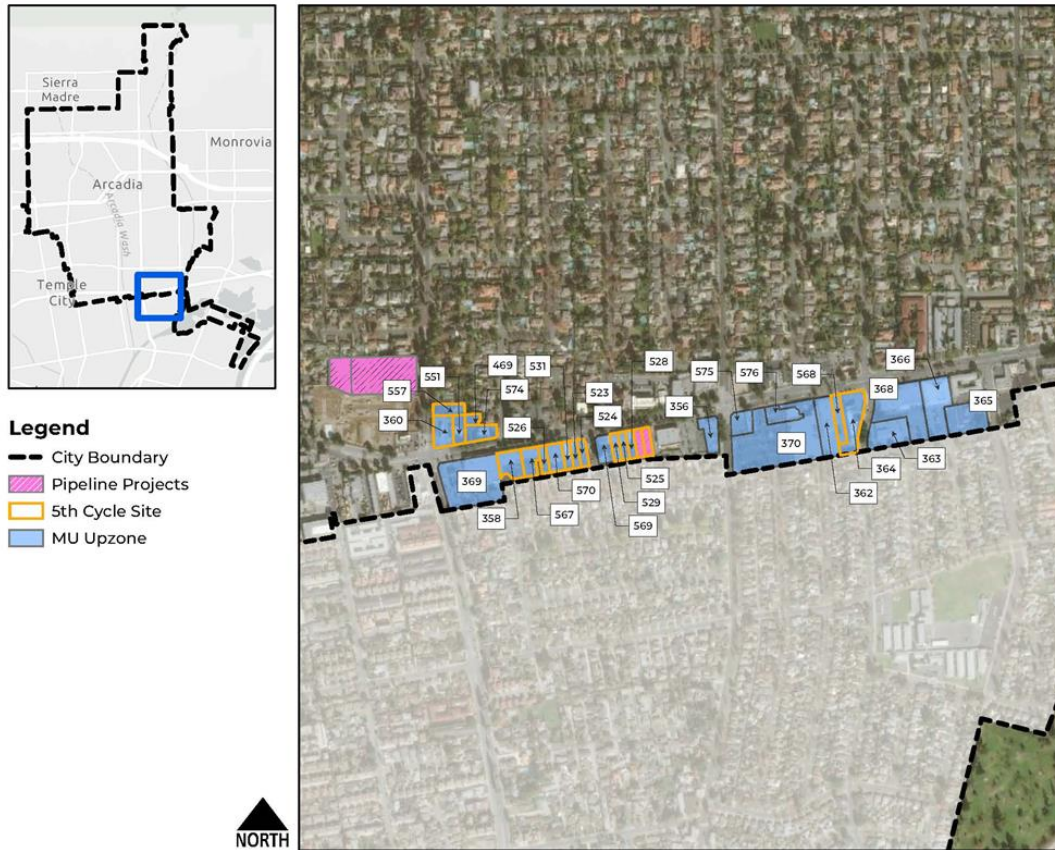
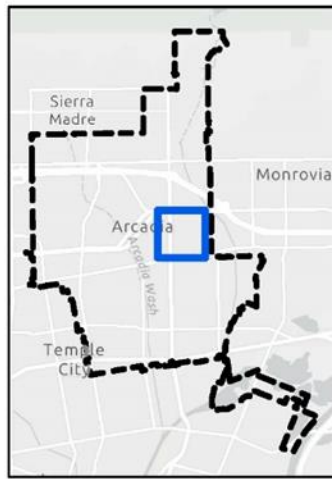






Exhibit 7: Map of Site Inventory – Mixed-Use Upzone (2)



Legend

-  City Boundary
-  MU Upzone
-  Pipeline Projects
-  5th Cycle Site

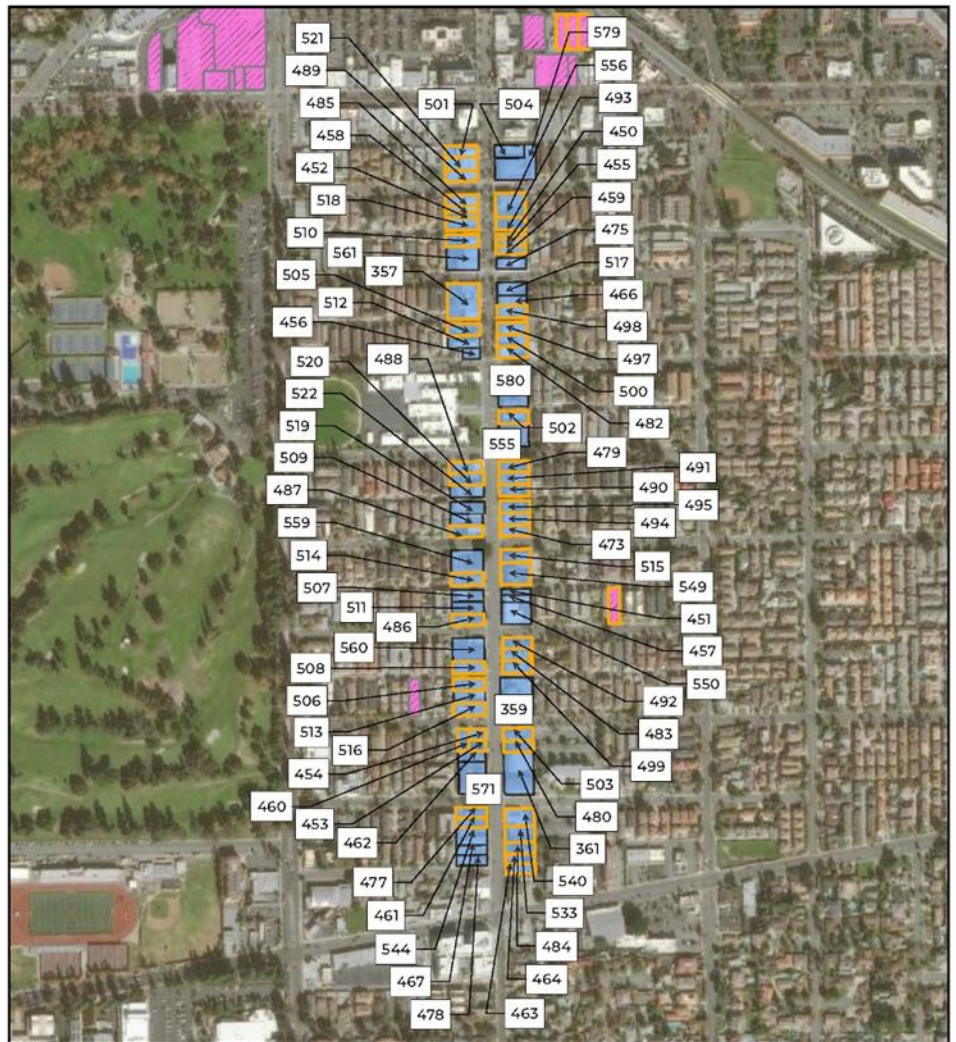


Exhibit 8: Map of Site Inventory – (Live Oak Corridor) Residential Flex Overlays



Exhibit 9: Map of Site Inventory – C-G Residential Flex Overlay



Exhibit 10: Map of Site Inventory – R-3 Upzone (1)

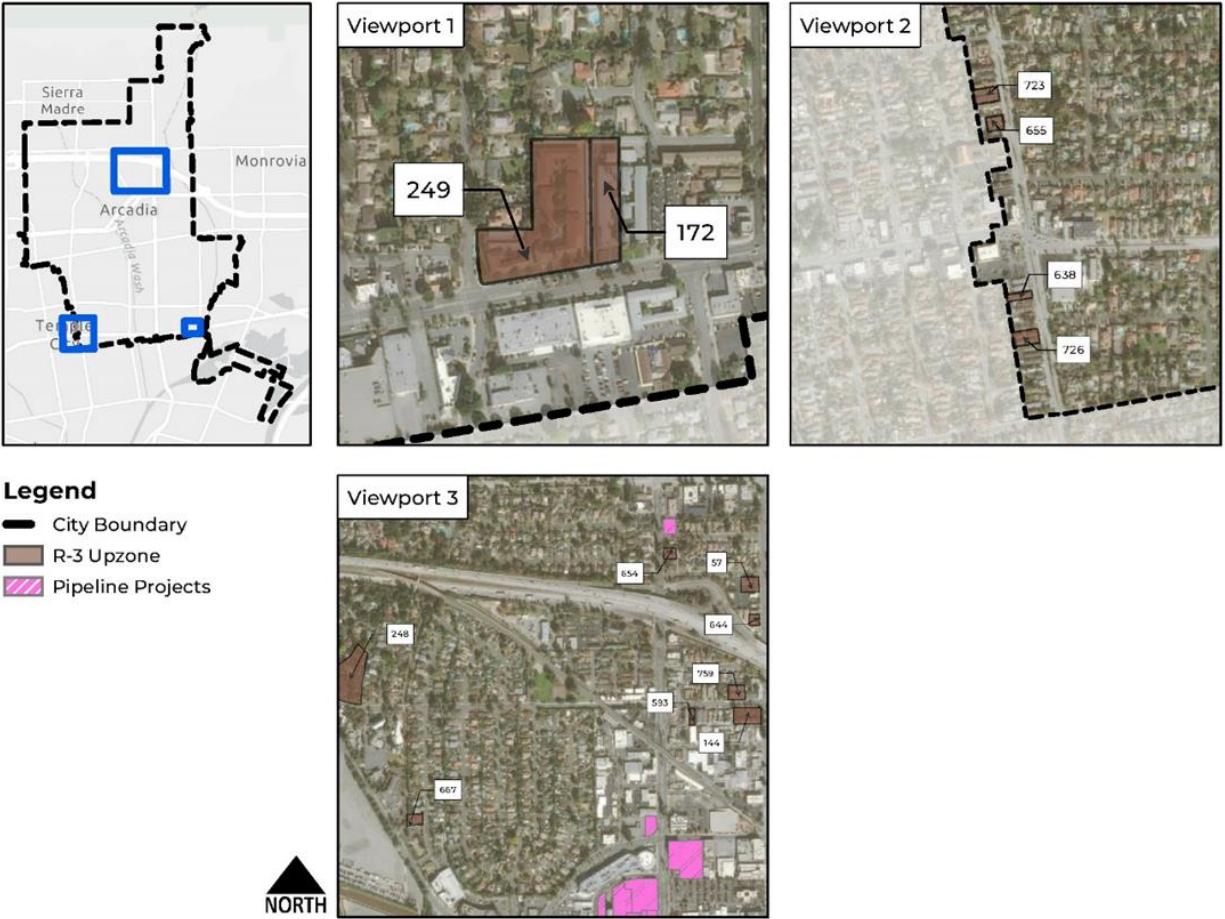


Exhibit 11: Map of Site Inventory – R-3 Upzone (2)

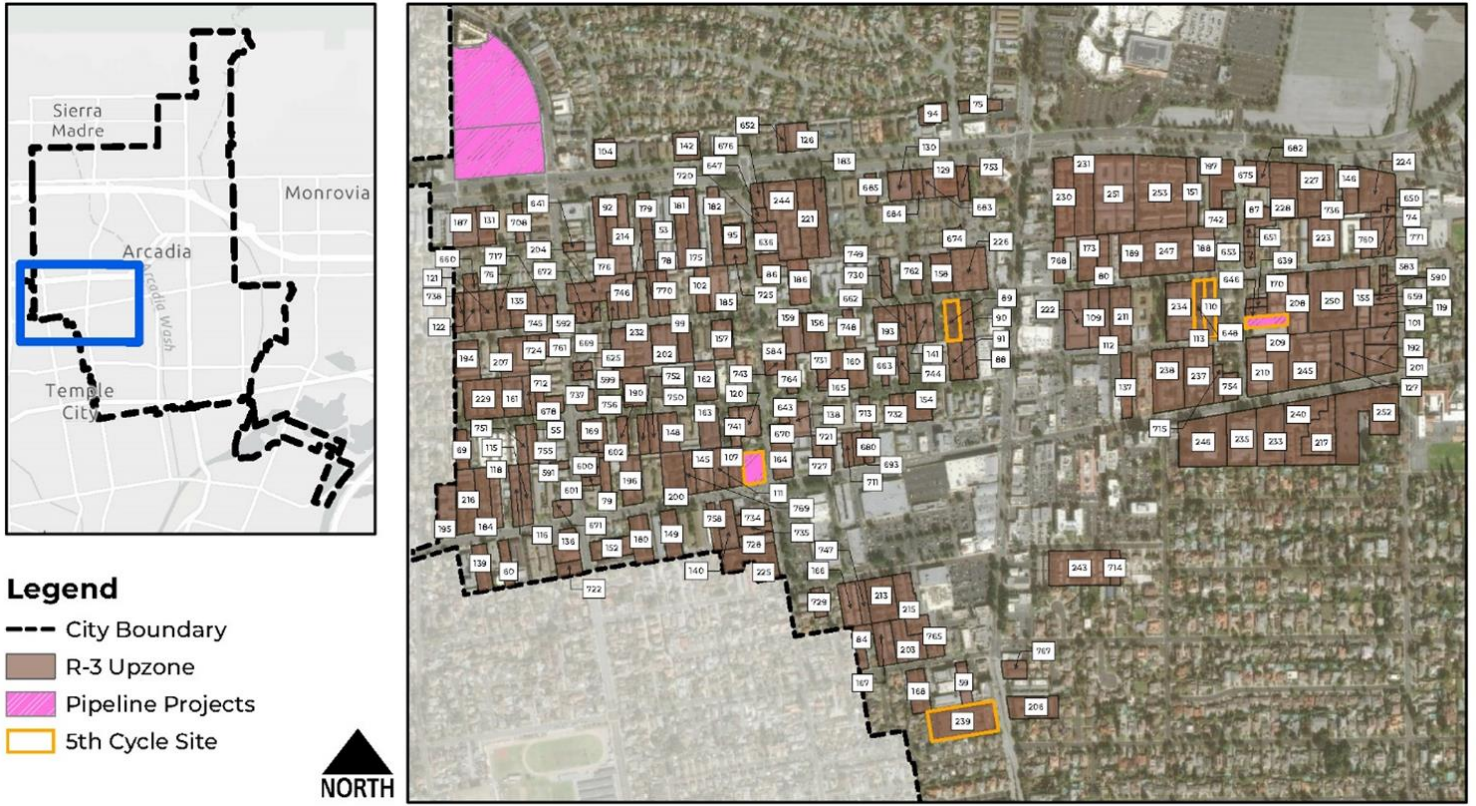


Exhibit 12: Map of Site Inventory – R-3 Upzone (3)



Legend

- City Boundary
- R-3 Upzone
- Pipeline Projects
- 5th Cycle Site

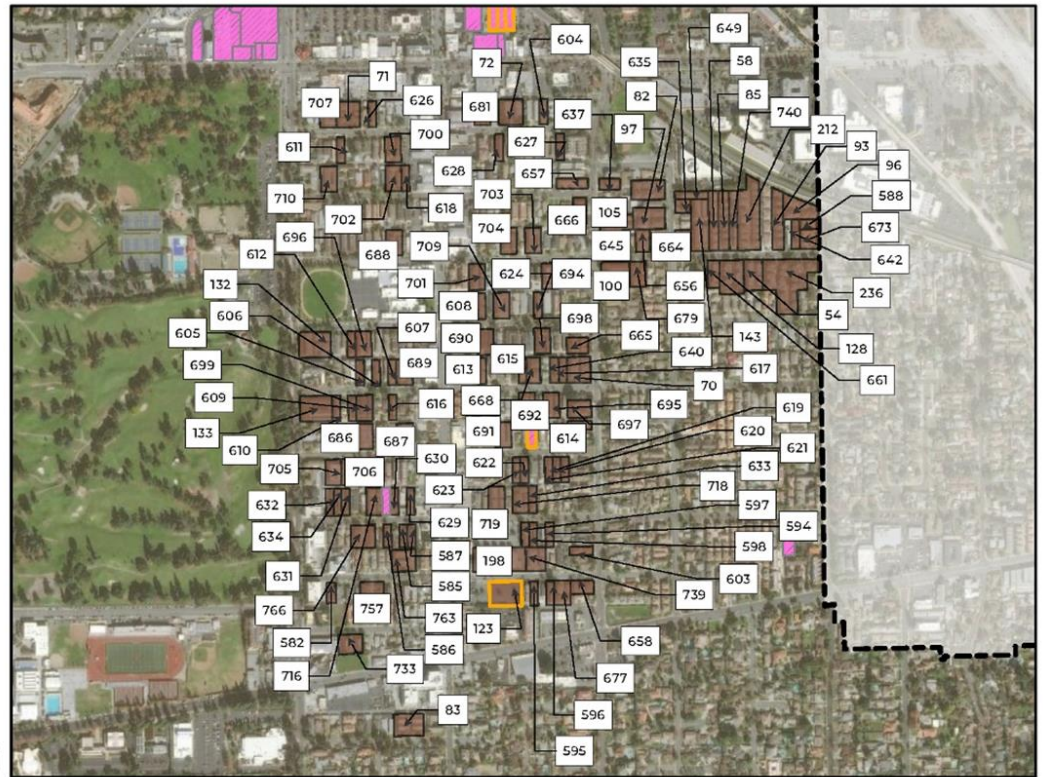
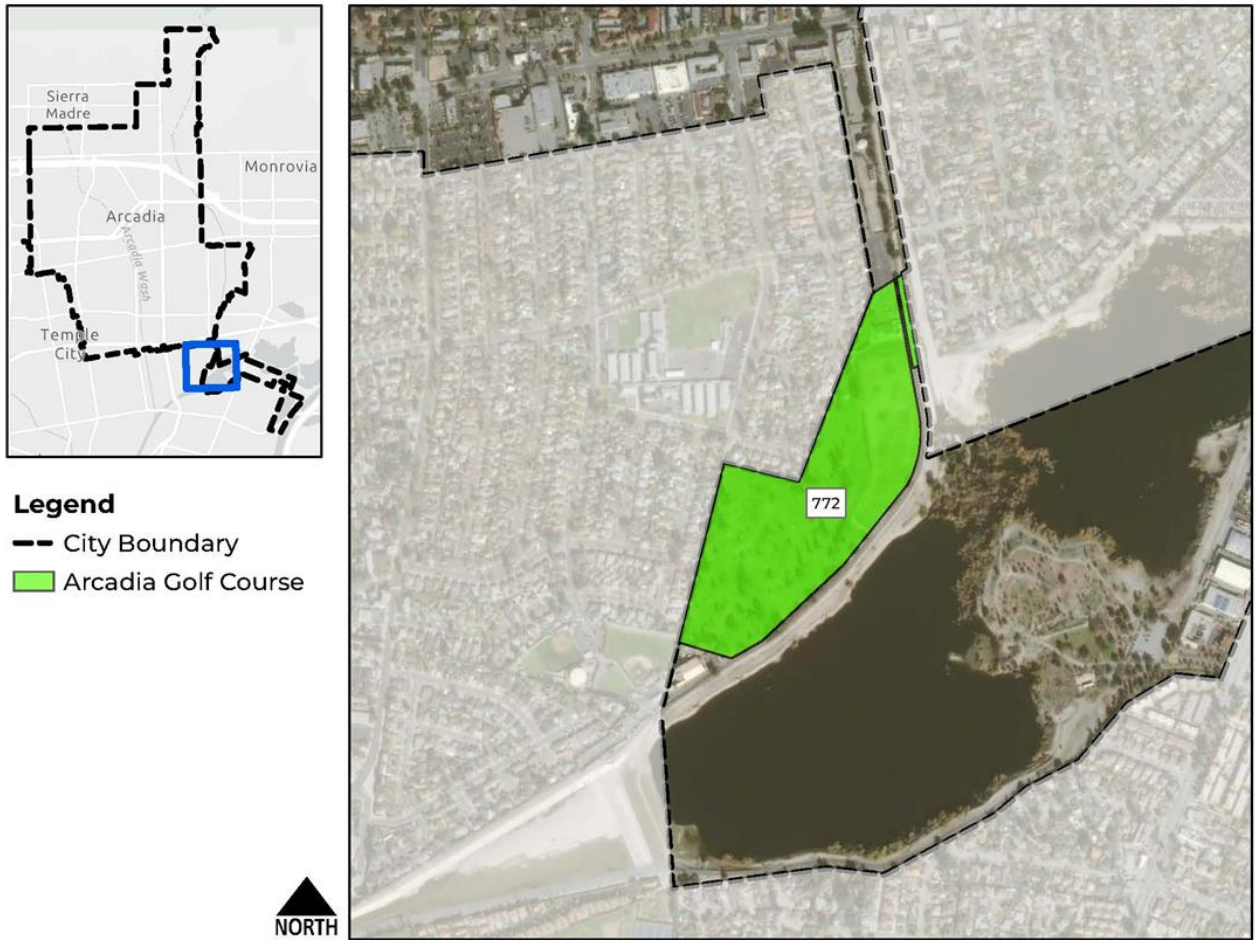


Exhibit 13: Map of Site Inventory – Arcadia Golf Course



3.0 INITIAL STUDY

1. Project Title: City of Arcadia 6th Cycle Housing Element Update (2021-2029)

2. Lead Agency Name and Address:
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91007

3. Contact Person and Phone Number: Lisa Flores at 626-574-5445

4. Project Location: City of Arcadia

5. Project Sponsor's Name and Address:
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91007

6. General Plan Designation: City-Wide 7. Zoning: City-Wide

8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheet(s) if necessary.)

See Section 2.0 Project Description.

9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings.)

The Project encompasses the entire City.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

California Department of Housing and Community Development (HCD)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

On June 1, 2021, the City received the negative result of the Sacred Lands File (SFL) from the Native American Heritage Commission (NAHC). On June 10, 2021, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18. No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

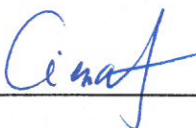
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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



Signature

Lisa Flores

Printed Name

12/14/21

Date

City of Arcadia

For

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 will 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 is 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 (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 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.

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board.				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III.	AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV.	BIOLOGICAL RESOURCES -- Would the project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	CULTURAL RESOURCES -- Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI.	ENERGY. Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VII.	GEOLOGY AND SOILS -- Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii)	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii)	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv)	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VIII.	GREENHOUSE GAS EMISSIONS -- Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IX.	HAZARDS AND HAZARDOUS MATERIALS -- Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X.	HYDROLOGY AND WATER QUALITY -- Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XI. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XII. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.	NOISE -- Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIV.	POPULATION AND HOUSING -- Would the project:				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XV.	PUBLIC SERVICES -- Would the project:				
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVI. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. TRANSPORTATION -- Would the project:				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 ⁹ or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁹ CEQA Guidelines section 15064.3(c) provides that a lead agency “may elect to be governed by the provisions” of the section immediately; otherwise, the section’s provisions apply July 1, 2020. Here, the District has not elected to be governed by Section 15064.3. Accordingly, an analysis of vehicle miles traveled (VMT) is not necessary to determine whether a proposed project will have a significant transportation impact.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII.	TRIBAL CULTURAL RESOURCES – Would the project:				
a)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVIII.	UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIX.	WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XX. MANDATORY FINDINGS OF SIGNIFICANCE --					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Note: Authority cited: Public Resources Code sections 21083, 21083.05, 21083.09.

Reference: Gov. Code section 65088.4; Public Resources Code sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21080.3.1, 21080.3.2, 21082.3, 21083, 21083.3, 21083.5, 21084.2, 21084.3, 21093, 21094, 21095 and 21151; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

ENVIRONMENTAL IMPACT DISCUSSION

A brief discussion of each impact conclusion is included below based on the environmental issues listed above and in Appendix G of the CEQA Guidelines.

I. Aesthetics

Would the Project:

a. Have a substantial adverse impact on a scenic vista?

Less Than Significant Impact. According to the Arcadia GP, the City's scenic resources and vistas include the San Gabriel Mountains and San Gabriel Mountains foothills located to the north of the City. 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 properties, or has a substantial change to the natural landscape.

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 proposed HEU 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 Arcadia GP policies and compliance with Arcadia Municipal Code (Arcadia MC), including Article IX, Chapter 1 - Development Code (Arcadia DC) standards. The City contains policies within the Arcadia GP which focus on the preservation of scenic vistas. These scenic vistas are visible mainly from the Hillside area of the City and are the focus of the policies within the Arcadia GP. The Project, however, does not identify any candidate sites within the Hillside area of the City, as shown in ***Exhibit 3***. Furthermore, the Arcadia GP EIR notes that the City does not contain any scenic vistas.¹⁰

Although the Project would not result in direct housing construction, any future housing developments would be required to demonstrate consistency with the above General Plan policies and ensuring that any proposed building heights would be consistent with the scale of surrounding and existing development. The proposed HEU would not result in a significant adverse effect on a scenic vista. Therefore, impacts to scenic vistas would be less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Less Than Significant Impact. There are no officially designated State scenic highways within the City. The nearest officially designated highway is a portion of SR 2 transition from Los Angeles

¹⁰ City of Arcadia. (2010). City of Arcadia General Plan EIR. Page 4.1-5.

County into San Bernardino County through the San Gabriel Mountains, starting at and Los Angeles Post Mile (PM) 27.2 and finishing at PM 82.265.¹¹ The final location of the SR 2 is approximately 2.7 miles north of Route 210 in the City of La Canada Flintridge, approximately 8.4 miles northwest of the City.¹² This scenic highway is approximately 6.4 miles north of the City's northernmost boundary. There are no highways within the City which are eligible for scenic highway classification.

Despite the lack of officially designated and eligible highways within the City, all future housing development facilitated by the HEU would be subject to the City's development review process and required to demonstrate consistency with Arcadia GP policies and compliance with Arcadia MC standards, including those intended to protect scenic resources. Therefore, project implementation would not substantially damage scenic resources associated with a scenic highway, historic building, or scenic resource. A less than significant impact would occur.

c. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. 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 Arcadia GP contains goals and policies that govern scenic quality. However, these goals apply to the Hillside area which has not been identified with any candidate sites.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA, and be required to comply with Arcadia GP policies, Arcadia MC standards, as well as be required to adhere to all federal, State, and local regulations for avoiding impacts to existing visual character or quality of public views of the site and its surroundings., including those that protect against degradation of visual resources by requiring project modifications, conditions of approval or mitigation measures, as needed. Because future housing development consistency with General Plan policies and compliance with Arcadia MC standards would be verified through the City's development review process, the project would not conflict with applicable policies or standards governing scenic quality. Therefore, impacts would be less than significant.

¹¹ California Department of Transportation (Caltrans). (2021). California State Scenic Highway System Map. Retrieved from: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed October 12, 2021

¹² Ibid.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. As previously noted, the Project would not result in direct housing construction, but would facilitate future housing development throughout the City. Future housing development could add a new source of substantial light and glare. Potential new light sources include exterior nighttime lighting fixtures, parking area lighting, light glow from windows, doors and skylights, and accent lighting. The introduction of concentrated or multiple sources of nighttime lighting near low-density areas could result in potential impacts.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA and be required to comply with all applicable requirements concerning light and glare, including the California Green Building Standards Code (Title 24 Part 11) and Arcadia MC §9103.01.120 – Exterior Lighting, which control light emissions in the City, and requires that lighting fixtures be shielded appropriately to eliminate light directed above the horizontal. Therefore, the HEU would not create a new source of substantial light or glare. Impacts would be less than significant.

II. Agriculture and Forestry

Would the Project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest land?*

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. The City is predominantly categorized as urban and build-up and there are no properties within or near the candidate housing sites designated Prime Farmland, Unique Farmland or Farmland of Statewide Importance, as classified by the State Department of Conservation Farmland Mapping and Monitoring Program (FMMP).¹³ Therefore, Project implementation would not conflict with existing agricultural zoning or a Williamson Act contract, or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, or conversion or loss of forest land. Future housing development facilitated by the HEU would allow for residential development on vacant and developed sites that are zoned for residential development and sites zoned for non-residential development that would be amended through prospective discretionary actions to allow future residential development. Future discretionary actions would be implemented in a case-by-case basis for future housing developments facilitated by the Project. Consequently, the HEU would not conflict with existing zoning nor would it cause rezoning of forest land, timberland, or timberland zoned Timberland Production. Project implementation would not rezone or convert forest land or timberland. Therefore, the HEU would result in no impact to agricultural or forest resources.

¹³ California Department of Conservation, California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>, Accessed October 7, 2021.

III. Air Quality

Would the Project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The City is located in the South Coast Air Basin (SoCAB). The South Coast Air Quality Management District (SCAQMD) and SCAG are responsible for developing and implementing the clean air plans for attainment and maintenance of ambient air quality standards in the SoCAB - specifically, the State Implementation Plan (SIP) and SCAG's Connect SoCal RTP/SCS, which includes the urbanized portions of Los Angeles, Riverside, Orange, and San Bernardino Counties.

The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. In 2016, the SCAQMD adopted the Air Quality Management Plan (AQMP) that integrated strategies and measures needed to meet the national ambient air quality standards (NAAQS) and the California ambient air quality standards (CAAQS). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. The primary purpose of an air quality plan is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act and California Clean Air Act. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the NAAQS and CAAQS.

Air quality impacts were assessed in accordance with methodologies recommended by California Air Resources Board (CARB) and the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod). The CARB mobile source emission projections and SCAG growth projections are based on population forecasts, vehicle trends, and land use plans developed by SCAG and the member counties, cities, as part of their general plan development.

As previously discussed, the HEU Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would allow for residential development on vacant and developed sites that are zoned for residential development and sites zoned for non-residential development that would be amended through prospective discretionary actions to allow future residential development. Future discretionary actions would be limited to the candidate housing sites.

Additionally, 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 all federal, State, and local regulations for minimizing construction and operational pollutant emissions, including the SCAQMD Rules listed below:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM₁₀ suppression techniques are summarized below.
 - Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
 - All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.
 - All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
 - The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
 - Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the workday to remove soil from pavement.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users 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.

Future housing development would be required to be consistent with the Arcadia GP, including Goals RS-1, RS-2, and RS-3 which encourages the reduction of toxic emissions and carbon

footprint. Therefore, air quality impacts from future development on candidate housing sites would be less than significant following compliance with the existing regulatory framework.

It is noted, the City's goal for the Project is to achieve Housing and Community Development (HCD) HEU certification; therefore, the project must comply with applicable federal, State, regional, and local housing laws, and policies. As a result, it is not anticipated that future housing development facilitated by the HEU would interfere with SCAQMD goals for improving air quality in the SoCAB or conflict with or obstruct implementation of applicable air quality plans. Therefore, anticipated air quality impacts would be less than significant.

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?

Less Than Significant Impact. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development throughout the City, which would occur as market conditions allow and at the discretion of the individual property owners. Future housing development could result in temporary, short-term pollutants from construction-related soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions would be temporary, with construction activities and associated emissions ceasing once housing development is complete. Further, construction emissions can vary substantially from day to day depending on activity level, the specific operation type, and, for dust, prevailing weather conditions.

California has 35 specific air districts, which are each responsible for ensuring that the criteria pollutants are below the NAAQS and CAAQS. Air basins that exceed either the NAAQS or the CAAQS for any criteria pollutants for set periods are designated as "non-attainment areas" for that pollutant. The cumulative setting for air quality includes Arcadia and the SoCAB. The SoCAB is designated as a nonattainment area for State standards of ozone, PM₁₀, and PM_{2.5}. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards.

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. The AQMP is designed to assist the region in attaining the applicable State and national ambient air quality standards and is intended to bring the SoCAB into attainment for all criteria pollutants.

All future housing development facilitated by the HEU would be subject the City's development review process and required to demonstrate compliance with federal, State, and local regulations in effect at the time of development, including the Arcadia GP policies and Arcadia MC standards.

The City's Environmental Assessment process outlined in the Arcadia MC §9107.03.070 and development process may require future housing development conduct air quality (and other technical) studies to demonstrate compliance with SCAQMD air quality construction thresholds. SCAQMD Rules 402 and 403 (e.g., prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) would be applied to future developments on a project-by-project basis in order to minimize those potential negative air quality effects. Emissions resulting from construction would be temporary and construction activities and associated emissions would cease following completion of each housing development.

Concerning operational thresholds, future housing development facilitated by the HEU would likely generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} operational emissions from mobile sources (i.e., vehicle trips), use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources (i.e., combustion of fuels used for space and water heating and cooking appliances). In analyzing cumulative impacts for future housing development facilitated by the HEU, an analysis must specifically evaluate a development's contribution to the cumulative increase in pollutants for which the SoCAB is designated as nonattainment for the CAAQS and NAAQS. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SoCAB. Future housing developments would be required to demonstrate that VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions would be below the significance thresholds for both construction and operational activities.

All future housing development would require further evaluation under this criterion to demonstrate that both daily construction emissions and operations would not exceed SCAQMD's significance thresholds for any criteria air pollutant. Additionally, future housing development construction activities would be subject to SCAQMD Rule 403: Fugitive Dust, which requires actions to restrict visible emissions of fugitive dust beyond the property line. Compliance with Rule 403 would limit fugitive dust (i.e., PM₁₀ and PM_{2.5}) that may be generated during grading and construction activities.

Future housing developments would also be subject to SCAQMD Rule 1113: Architectural Coatings, which establishes maximum VOC contents. All future development facilitated by the HEU would also be subject to environmental review under CEQA, the City's development review process, and required to adhere to relevant federal, State, and local regulations for minimizing construction and operational pollutant emissions. Future housing development, at a minimum, would be required to meet California Green Building Standards Code (CALGreen) and Energy Code (Title 24, Part 6 of the California Code of Regulations) mandatory energy requirements in effect at the time of the development application. Projects would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Considering these

requirements, future development housing development facilitated by the HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the SoCAB is in nonattainment under an applicable federal or State ambient air quality standard. Therefore, impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed above, the Project does not propose any development; however, the Project facilitates future housing development consistent with State Housing laws. The candidate housing sites were evaluated in this IS/ND at a programmatic level, as discussed above. Future housing development would be evaluated on a case-by-case basis. As a result, no air modeling was conducted for this analysis

Toxic Air Contaminants

Future housing development facilitated by the Project could include emissions of pollutants identified by the State and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. Compliance with various measures (e.g., 13 California Code of Regulations (CCR) 2449 and 13 CCR 2485) would be required by State law to reduce DPM emissions. It is unlikely that future housing development facilitated by the HEU would require the extensive operation of heavy-duty construction equipment, or extensive use of diesel trucks, which would be subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. The following measures are required by State law to reduce DPM emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for in-use off-road diesel vehicles (13 CCR 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

Carbon Monoxide Hot Spots

Mobile-source impacts, including those related to CO, occur essentially on two scales. Regionally, construction travel associated with future housing development would add to regional trip generation and increase the vehicle miles travelled (VMT) within the local airshed and the SoCAB. Locally, construction traffic would be added to the roadway system in the vicinity of future housing development sites. There is a potential for the formation of microscale CO “hotspots” to

occur immediately around points of congested traffic. Hotspots can form if traffic occurs during periods of poor atmospheric ventilation that is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and/or is operating on roadways already congested with existing traffic.

Typically, high CO concentrations are associated with congested roadways. Traffic associated with future housing development facilitated by the HEU could contribute to traffic congestion that could result in the formation of CO hotspots. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SoCAB is steadily decreasing.

All future housing development facilitated by the HEU would require further evaluation under this criterion through the City's development review process to demonstrate that both daily construction emissions and operations would not exceed SCAQMD's significance thresholds for any criteria air pollutant.

Future construction activities would be subject to environmental review under CEQA and comply with SCAQMD Rules. Therefore, future housing development facilitated by the HEU would not 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?

Less than Significant. The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

However, future housing development facilitated by the Project could result in odors generated from vehicles and/or equipment exhaust emissions during construction. These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. The HEU Project does not propose any development nor include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors and a less than significant impact would occur.

IV. Biological Resources

Would the Project:

- a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

Less Than Significant Impact. According to the Arcadia GP EIR, the City is nearly built out and only approximately one (1) percent of the total land area in the City and its SOI remain as vacant and undeveloped.¹⁴ As such, the majority of plant and animal habitats are located in urban environments with non-native and ornamental landscaping.¹⁵ Outdoor recreation areas in the City include the Arboretum of Los Angeles County, Arcadia County Park, Santa Anita County Golf Course, Wilderness Park (which includes high quality alder riparian forest), and a few other smaller parks and a private golf course.¹⁶ Although the vegetation consists mainly of non-native ornamental landscaping in these areas, some patches of native vegetation remain, and many native trees exist including coast live oaks and western sycamores.¹⁷ There are open spaces found along the Sierra Madre, Santa Anita, and Arcadia Washes, with larger areas in the upper Santa Anita Wash in the northeastern portion of the City and Peck Road County Park in the southeastern portion of the City.¹⁸ The Santa Anita Wash open space area consists mainly of mechanically disturbed areas that function as access routes and spreading grounds for flood control activities. It also supports many coast live oak and western sycamore trees, along with patches of native habitat, including oak-sycamore riparian forest with native understory components and high quality coastal sage scrub.¹⁹ Peck Road County Park was once a gravel mining pit, and now consists of a large lake fed by the Santa Anita and Sawpit Washes. The park is utilized by the public for fishing and bird-watching and supports a few stands of willow (*Salix* spp.) riparian forest and scrub vegetation at the lake margins.²⁰

The California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) may list species as threatened or endangered under the California Endangered Species Act (CESA) or Federal Endangered Species Act (FESA), respectively. The USFWS can designate critical habitat that identifies specific areas that are essential to the conservation of a listed species.

¹⁴ City of Arcadia. *2010 General Plan Update Environmental Impact Report*. Available at https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708. Accessed November 2021.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. However, given the City is predominantly urban and developed, the candidate housing sites mostly include properties that have either been developed, disturbed, and/or adjacent to existing development. However, future housing development could potentially impact candidate, sensitive, or special status wildlife or plan species through direct or indirect disturbance or elimination of essential habitat.

Additionally, future housing development facilitated by the HEU may have the potential to impact nesting birds which have acclimated to urban life and nest and forage in the local trees and shrubs. These bird species are protected under the Migratory Bird Treaty Act (MBTA). Although the MBTA is no longer interpreted to protect migratory birds and raptors from incidental take, State Fish and Game Commission §3503 and §3503.5 still provide these protections. If vegetation clearing would occur during the bird breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds), direct impacts to nesting birds could occur.

The City has identified the Arcadia Golf Course as a site to accommodate residential units across all of the income categories. As shown on **Exhibit 2-13**, the Arcadia Golf Course is approximately 25.86 acres in size and has the capacity to accommodate up to 192 units. Future development of the Arcadia Golf Course facilitated by the HEU would be subject to project-specific CEQA review and would be required to comply with site-specific applicable mitigation measures, if any. Future development of the Arcadia Golf Course site would also be subject to the City's development review process. However, as stated above, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City, including the Arcadia Golf Course.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA that includes site-specific analysis and would be required to demonstrate compliance with federal, State, and local regulations aimed at protecting biological resources.

Following compliance with the established regulatory framework described above, future housing development would not result in substantial adverse effect, either directly or indirectly, or through habitat modifications to special status wildlife and plants. Therefore, impacts would be less than significant level.

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?

Less Than Significant Impact. The HEU Project would not result in direct housing construction but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA 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 Arcadia GP, as discussed in Threshold 4(a) above. Therefore, the HEU would not result in substantial adverse effect, either directly or indirectly, on any sensitive vegetation communities and impact would be less than significant in this regard.

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?

Less Than Significant Impact. As previously noted, the project would not result in direct housing construction but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and required to demonstrate compliance with relevant federal, State, and local regulations for avoiding and minimizing impacts to wetlands and other waters of the U.S. and State. Following compliance with the established regulatory framework future housing development would not result in substantial adverse effect, either directly or indirectly, on any known wetlands or other waters of the U.S. and State. A less than significant impact would occur.

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?

Less Than Significant Impact. Future projects are not expected to substantially interfere with the movement of any native species. All future housing development facilitated by the HEU would also be subject to environmental review under CEQA, the City's development review process, and required to adhere to relevant federal, State, and local regulations for avoiding and minimizing interference with the movement of any native resident or migratory fish and wildlife species, migratory wildlife species, or migratory wildlife corridors. Future housing development where the City has determined a potential for impacts to a wildlife corridor, would be required to comply with the established regulatory framework and mitigation measures of the Arcadia GP and Arcadia MC. Therefore, future housing development would result in a less than significant impact on wildlife corridors. Anticipated impacts would be less than significant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The City has policies and ordinances for the protection of trees. The City's Oak Tree Regulations protect Engelmann oaks, coast live oaks, and other oak trees. The City also has a Comprehensive Tree Management Program for the protection of street trees.²¹ As previously stated, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process which may include environmental review under CEQA and be required to demonstrate compliance with the Arcadia GP goals and policies, Arcadia MC standards, federal, State, and local regulations. Future housing development would also be required to comply with the Oak Tree Regulations and the Comprehensive Tree Management Program. Therefore, HEU would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant.

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?

No Impact. Currently, the City does not have Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans that cover habitats located within the City. As discussed above, the project would not result in direct housing construction, but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to demonstrate compliance with federal, State, and local regulations regarding biological resources and policies. The Project would not conflict with any local policies or ordinances protecting biological resources, and no impact is anticipated in this regard.

²¹ City of Arcadia. 2010 General Plan Update Environmental Impact Report. Available at https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708. Accessed November 2021

V. Cultural Resources

Would the Project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Less Than Significant Impact. The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Therefore, future housing development facilitated by the HEU could cause a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines §15064.5, through demolition, destruction, relocation, or alteration, if such a resource is present on or near the site. There are 31 cultural resources, including both archaeological and historic resources, recorded at the South Central Coastal Information Center (SCCIC). In addition, there are three (3) built environmental historic resources that are eligible for listing or listed in the National Register of Historic Places (NRHP). The potential impacts to known cultural resources resulting from future housing development facilitated by the HEU would be assessed on a case-by-case basis at the time of the projects are proposed. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA and be required to adhere to all federal, State, and local regulations for avoiding impacts to historical resources, including the National Historic Preservation Act. Arcadia GP Goal PR-9 aims to retain and preserve the City's significant historical and cultural resources and provide public understanding and involvement of the unique heritage of the City.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. As previously noted, the HEU is a policy document and would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, ground-disturbing activities such as grading or excavation, associated with future housing development facilitated by the HEU could impact archaeological resources. The likelihood of encountering archeological resources on undeveloped sites is greatest given these have been minimally disturbed in the past (e.g., undeveloped parcels, vacant lots, and lots containing undeveloped areas). Alternately, previously disturbed sites are generally considered to have a lower potential for archeological resources, since previous construction activities may have already removed or disturbed soil that may have contained resources. A majority of the candidate housing sites are located in areas urban and built areas that have been developed, except for the approximately 25.86-acre Arcadia Golf Course. However, future development of the proposed 192-unit within the Arcadia Golf Course facilitated by the HEU would be subject to project-specific CEQA review and would be required to comply with site-specific applicable

mitigation measures, if any. Future development of the Arcadia Golf Course site would also be subject to the City's development review process. However, as stated above, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City, including the Arcadia Golf Course.

Future housing development could disturb and potentially destroy subsurface prehistoric/historic archaeological resources through ground disturbances. All future housing development facilitated by the HEU would therefore be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for avoiding impacts to archeological resources. This includes compliance with the Arcadia GP, which includes goals aimed at reducing archeological impacts. Compliance with the established regulatory framework would reduce any potential impacts to less than significant.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. According to the Arcadia GP EIR, no known human remains, including those interred outside of formal cemeteries, have been identified in the City.²² While it is not expected human remains within a formal cemetery would be disturbed as a result of future development facilitated by the Project, human remains could be accidentally uncovered during grading and ground moving activities occurring during future housing development facilitated by the Project. Thus, future construction of the candidate housing sites has the potential to disturb sacred human remains through grading, thereby resulting in a potentially significant impact.

In the unlikely event that human remains are discovered, the provisions set forth in California PRC §5097.98 and State HSC §7050.5 would be implemented in consultation with the assigned most likely descendant as identified by the NAHC. In this event, no further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City would be required to comply with the California Native American Graves Protection and Repatriation Act (2001) and the Federal Native American Graves Protection and Repatriation Act (1990). These regulations would address inadvertent uncovering of human remains during grading. Compliance with the established regulatory framework would result in a less than significant impact.

²² City of Arcadia. 2010 General Plan Update Environmental Impact Report. Available at https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708. Accessed November 2021.

VI. Energy

Would the Project:

- a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Construction

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. Therefore, future housing development facilitated by the HEU would result in the direct consumption of electricity and natural gas resources. Energy use from construction activities would primarily result from the use of diesel fuel (e.g., mobile construction equipment), fuel use by vehicles and construction equipment and vehicle trips associated with workers commuting to and from construction sites, and electricity (e.g., power tools) and fuel use. During construction, some incidental energy conservation would occur through compliance with State requirements. Construction equipment would also be required to comply with the latest Environmental Protection Agency (EPA) and CARB engine emissions standards. Construction-related energy consumption associated with future housing developments would be subject to project-level review, approval by the City, and environmental review under CEQA.

Future construction activities associated with future housing development would also be required to monitor air quality emissions using applicable regulatory guidance per SCAQMD. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced as a result of monitoring and the efficient use of equipment and materials, this results in reduced energy consumption. There are no aspects of the HEU that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities of future housing developments.

There are no unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Future housing developments would be subject to environmental review under CEQA and project-specific review and approval to ensure compliance with applicable City goals, policies, and code requirements. Therefore, it is expected that construction fuel consumption associated with the HEU would not be any more inefficient, wasteful, or unnecessary than other similar projects of this nature. Impacts to energy resources associated with the future developments' construction activities would be less than significant. Project implementation would not grant any entitlements or building permit issuances that would result in wasteful, inefficient, or unnecessary consumption of energy resources.

Operations

Less Than Significant Impact. 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 would consume energy during operations through building electricity, water, and natural gas usage, as well as fuel usage from on-road vehicles. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas and could potentially be fueled by electricity. All future housing development facilitated by the HEU would be subject to the City's development review process and required to adhere to all federal, State, and local requirements for energy efficiency, including Senate Bill (SB) 32's Scoping Plan that includes a 50 percent reduction in petroleum use in vehicles and the latest Title 24 standards. It is also be noted that the project design and materials would be subject to compliance with the most current Building Energy Efficiency Standards. Prior to issuance of a building permit, the City would review and verify that the project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The project would also be required adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, project implementation would not result in a substantial increase in transportation-related energy uses, such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As previously discussed, the Project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the Project would be required to comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful, and unnecessary energy consumption, and no adverse impact would occur. Further, the Project would also be required to comply with the policies included in the Arcadia GP Goal RS-5 aimed at reducing energy consumption.

Future housing development facilitated by the proposed project would be required to obtain permits and comply with federal, State, and local regulations aimed at reducing energy consumption. Federal and State energy regulations, such as the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through future development permit review to minimize future energy consumption. Therefore, future housing development facilitated by the HEU would be required to be consistent with applicable federal, State, and local laws, policies, and regulations related to renewable energy and energy efficiency. No direct physical environmental impacts would occur.

VII. Geology and Soils

Would the Project:

- a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving***
 - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?***
 - ii. *Strong seismic ground shaking?***

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act (Act) was passed in 1972 to address the hazard of surface faulting to structures for human occupancy. Alquist-Priolo fault zones are those that contain active faults that have erupted within the last 11,000 years. Alquist-Priolo fault zones prohibit the development of structures which allow for human occupancy within their boundaries or along their fault lines. The City contains two fault zones; the Arcadia – Colton Fault, and a portion of the San Jacinto Fault. The City contains two fault zones; the Raymond Fault, and a portion of the Sierra Madre Fault. The portion of the Sierra Madre Fault is not considered an Alquist-Priolo Fault Zone, the Raymond Fault is. A portion of the candidate housing sites in are located in the Alquist-Priolo fault zone. However, these areas were previously evaluated in the Arcadia GP EIR analysis and future housing development facilitated by the HEU would be required to adhere to the applicable mitigation measures to reduce impacts to less than significant. Furthermore, the Project would comply with applicable goals and policies contained within the Arcadia GP including Goal S-1, Policy S-1.2, and Policy S-1.3.

All other future housing development outside of the Alquist-Priolo fault zone area would also be required to demonstrate conformance with seismic design guidelines and requirements contained in the current Title 24 - California Standards Building Code (CBC). The CBC contains design and construction regulations pertaining to seismic safety for buildings, which covers issues such as ground motion, soil classifications, redundancy, drift, and deformation compatibility. The City's Geotechnical Investigation Ordinance requires new developments to fully analyze the geological condition of their project sites as well as any potential effect associated with development of their project sites. Therefore, impacts would be less than significant, and no mitigation is required.

- iii. *Seismic related ground failure, including liquefaction?***
- iv. *Landslides?***

Less Than Significant Impact. Liquefaction is the loss of strength where loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions. According to the Arcadia GP's Figure S-3, Liquefaction and Landslide Hazards, the Project site contains a general area designated as an Area of Moderately Liquefaction Susceptibility in the City's northern and southern portions. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, future housing facilitated by the HEU could be subject to liquefaction. 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 all federal, State, and local requirements. The City requires inclusion of a Soils Report, per the Arcadia MC §9105.09.110, to be included in grading plans. Therefore, future housing development would be subject to the requirements of the Arcadia MC §9105.09.110. Considering these requirements, including the preparation of Soils Reports for future housing developments, as required by City Codes, future housing development facilitated by the HEU would not create substantial risks to life or property associated with expansive soils. The Project candidate housing focus areas are relatively flat and not within an area susceptible to landslides. Therefore, impacts would be less than significant.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, future development facilitated by the HEU would involve grading activities that would disrupt soil profiles, and thereby result in potential increased exposure of soils to wind and rain. Erosion on graded slopes could cause downstream sedimentation impacts. Other related impacts resulting from substantial short-term erosion or loss of topsoil include topography changes and the creation of impervious surfaces. As previously noted, 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 all federal, State, and local requirements for avoiding and minimizing impacts concerning soil erosion or loss of topsoil.

Prior to initiation of ground disturbing activities, future project applicants would be required to demonstrate compliance with the Arcadia MC including requirements pertaining to erosion control to the satisfaction of the City engineers. Short-term construction-related erosion would be addressed through compliance with the NPDES program, which requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) and best management practices (BMPs) intended to reduce soil erosion. Considering these requirements, future housing development facilitated by the HEU would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The potential for liquefaction is greatest in the northeast portion of the City, away from potential candidate sites.

The project would not result in direct housing construction but would facilitate future housing development 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 adhere to all federal, State, and local requirements, including the City's Building and Construction codes (Arcadia MC Article VIII). Considering these requirements, including the preparation of Soils Reports for future housing developments, future housing development facilitated by the HEU would not create substantial risks to life or property associated with expansive soils. Therefore, impacts would be less than significant.

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?

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. All future housing development facilitated by the HEU would be in areas served by the City's sanitary sewer system and would therefore not use septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. 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 relevant federal

and State regulations regarding paleontological resources. The 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.

VIII. Greenhouse Gas Emissions

Would the Project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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. As noted in **Section 14: Population and Housing**, the future housing development facilitated by the HEU could potentially result in a population growth of 17,346 persons or approximately 30 percent from the estimated 2020 population of 57,820, as shown in **Table 1**.

Future housing development facilitated by the HEU would result in an increase in GHG due to increased VMT, construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. GHG emissions associated with future development are anticipated to include CO₂, N₂O, and CH₄. Future housing development would be subject to the City's discretionary review process, CEQA evaluation, and plan check process, which may require future applicants prepare air quality and greenhouse gas emission studies using the California Emissions Estimator Model (CalEEMod). CalEEMod relies upon project-specific land use data to calculate emissions. Site-specific details are not available for this analysis of the HEU, which is programmatic in nature.

The SCAG's Connect SoCal: The 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals.²³ The City's existing zoning designations could potentially facilitate housing developing in certain commercially zoned areas, and therefore reduce VMT and GHG impacts by creating housing opportunities in areas with pedestrian connectivity between residential and commercial uses and in proximity to public transportation, along established transportation corridors, near recreation opportunities, and away from environmentally sensitive resources. Future housing development facilitated by the HEU would be required to meet the mandatory energy requirements of California Green Building Standards Code (CALGreen) and the Energy Code (CCR Title 24, Part 6) in effect at the time of development. These regulations require that new development incorporate design features to capture energy efficiencies associated with building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Future housing development would

²³ SCAG. *Connect SoCal (2020)*. Retrieved from <https://scag.ca.gov/connect-socal>. Accessed on August 25, 2021.

also be required to implement strategies outlined in the City's climate action plan, which includes several measures that have the potential to reduce GHG emissions. As a result, fewer VMT results in fewer GHGs. Therefore, future development facilitated by the HEU would not generate significant greenhouse gas emissions impacts. Impacts are anticipated to be less than significant.

b. Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project does not include physical alterations to the City which could directly create changes to the City's existing air quality or regional air quality. Instead, the Project proposes multiple regulatory changes to the City's General Plan. The City has identified candidate housing sites which would allow for the future development of additional DUs. These candidate housing sites are spread throughout the City. **Exhibit 3: Map of Candidate Housing Sites** shows the location of the identified candidate housing sites within the City.

As summarized in **Section 14: Population and Housing**, additional housing developments facilitated by the Project would exceed the City's buildout growth projections in 2035. Therefore, the additional housing associated with the Project could inherently generate GHG at a rate that exceeds previous estimates or established limitations. Future housing development facilitated by the Project would result in an increase in GHG due to increased vehicle miles traveled (VMT), construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. GHG emissions associated with future development are anticipated to include CO₂, N₂O, and CH₄. At the time of their initiation, new developments facilitated by the Project would be required to comply with applicable federal, State, and local regulations regarding GHG emission. This includes policies instituted by SCAQMD in which developers would be required to comply with one of five exclusion tiers in order to avoid significant environmental impacts. Furthermore, future projects facilitated by the Project would continue to be required to comply with the California Building Code, which includes Title 24, Part 11. This requires residential developments to be planned and developed in a manner that is consistent with any applicable regulations involving energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality.

The HEU is a policy document and would not directly generate additional GHG emissions within the City. The Project is being created in accordance with the State Housing Law and general plan laws. To comply with the laws, the Project would need to be created within the framework provided by State law and would therefore not conflict with other established State laws such as GHG regulations. Further, future development facilitated by the Project would be required to comply with existing GHG regulations and with the proposed additions to the Arcadia GP.

Therefore, potential impacts to GHG levels as a result of Project implementation would be less than significant without mitigation.

IX. Hazards and Hazardous Materials

Would the Project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. 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 and the State Department of Toxic Substances Control (DTSC) 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. Impacts associated with the transport, use, or disposal of hazardous materials would be less than significant.

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?

Less Than Significant Impact. The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, excavation and grading activities associated with future development facilitated by the HEU could expose construction workers and the general public to unknown hazardous materials present in soil or groundwater. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to demonstrate consistency with the regulatory framework for minimizing upset associated with hazardous materials. Following compliance with the established regulatory

framework potential impacts involving the accidental discovery of unknown wastes or suspect materials during construction would be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Project would not result in direct housing construction but would facilitate future housing development throughout the City. The future housing development facilitated by the HEU would have a potentially significant impact on the environment if it would emit hazardous emissions or substances within 0.25-mile of an existing or proposed school. However, by its nature, and compared to existing land uses, future residential uses from the proposed candidate housing sites would not typically emit hazardous materials, substances, and wastes that are more hazardous than that of more intense uses such as commercial, industrial, and mixed uses. Further, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. Adherence to California Hazardous Waste Control Law, California Health and Safety Code, and Resource Conservation and Recovery Act (RCRA) regulations would reduce potential impacts associated with the accidental release of hazardous materials. As a result, future housing development facilitated by the HEU would not conflict with any State or local plan aimed at preventing emissions or handling of hazardous materials near schools. Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. Refer to the responses above. The Department of Toxic Substance Control (DTSC) is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, clean-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Government Code §65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, the State Department of Health Services' lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board (SWRCB) as having underground storage tank leaks and having had a discharge of hazardous wastes or materials into the water or groundwater; as well as, lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

As previously noted, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. As Such, all future development would be subject to verification of the site(s) none-inclusion on the list of hazardous waste sites (Cortese List) compiled by the DTSC pursuant

to CGC §65962.5. Per Arcadia GP Goal S-4 and Implementation Actions 8-6 and 8-7, future housing development facilitated by the HEU would be required to comply with existing regulations; as well as prepare Environmental Site Assessments to identify and abate hazardous material releases from prior land uses.²⁴ In addition, compliance with applicable federal, State, and local regulations would result in a less than significant impact concerning hazardous materials sites.

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?

Less Than Significant Impact. As discussed in the Arcadia GP EIR, the nearest airport to the City is the El Monte Airport; however, the Runway Protection Zone (RPZ) for the El Monte Airport does not extend into the City of Arcadia.²⁵ However, future housing development facilitated by the HEU in the southern section of the City, including development within the Live Oak Corridor and the Arcadia Golf Course may extend into the navigable airspace (within two (2) miles) of the El Monte Airport and could affect aircraft landing and take-off operations.²⁶ As such, future housing development facilitated by the HEU in these areas would be required to comply with the height limitations in the FAR Part 77.²⁷ Further, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all applicable regulations. A Less than significant impact would occur in this regard.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Future housing development facilitated by the HEU would increase allowable housing capacity in certain areas located throughout the City. This increase in density could result in an increased demand on emergency evacuation services in the event of a citywide or partial city emergency. However, the increased housing capacity associated with the HEU would predominantly occur within areas that have already been developed with residential and non-residential uses. Therefore, no changes in the City's existing circulation network are proposed or required under the HEU and no impact to emergency response or evacuation is anticipated. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include

²⁴ City of Arcadia. 2010 General Plan – Section 10 Implementation Plan. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/general%20plan/Implementation%20Plan.pdf>. Accessed November 2021.

²⁵ City of Arcadia. 2010 General Plan Environmental Impact Report – Section 4.7 Hazards and Hazardous Materials. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Hazards.pdf>. Accessed November 2021.

²⁶ Ibid.

²⁷ Ibid.

environmental review under CEQA, Arcadia MC, including §9103.07 which requires developers to include suitable site access for emergency vehicles. As a result, future housing development facilitated by the HEU would not conflict with any State, County, or local plan aimed at preserving and maintaining adopted emergency response or emergency evacuation plans. Impacts would be less than significant.

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

Less Than Significant Impact. Refer to **Section 20: Wildfire**. Future housing development facilitated by the Project would not directly or indirectly expose people or structures to a risk of loss, injury or death involving wildland fires. The City has significant interface areas where a proactive approach to preventing the start and spread of wildland fire is vital to protecting lives and property. The northern portion of the City's area is designated as Very High fire hazard severity zones, as mapped by CAL FIRE. The candidate housing sites may be developed in these areas adjacent to areas near open space; therefore, risk of wildfire could occur.

Federal, State, and county fire suppression agencies have responsibility areas in the City. To protect the City and its residents from fire hazards, the City has building and fire codes that must be followed. Using fire-resistant building materials, implementing fuel modification zones, and maintaining vegetation clearance around structures is required to protect buildings and reduce the potential loss of life and property. New development in wildland and urban-wildland interface areas must be consistent with the existing regulations, including the State Fire Code, to meet fire safety standards for building construction. Additionally, the California Building Code includes sections on fire-resistant construction material requirements based on building use and occupancy. The construction requirements are a function of building size, purpose, type, materials, location, proximity to other structures, and the type of fire suppression systems installed. Because the State of California, County of San Bernardino, and the City require adherence to building codes and review by the fire department to reduce wildland fires, fire hazard impacts would be less than significant.

X. Hydrology and Water Quality

Would the Project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

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. Future housing development could result in potential impacts related to water quality over three (3) 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.

Construction

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 the City's Storm Water Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8). The Stormwater Ordinance establishes requirements for the management of storm water flows from development projects, both to prevent erosion and to protect and enhance existing water-dependent habitats. The Ordinance assures consistency with the purpose and intent of this chapter and shall implement the requirements of an NPDES Permit.

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 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, to install, implement, and maintain the BMPs identified in Arcadia MC §7823 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 Arcadia MC §7823 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.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. In 2014, the State of California adopted the Sustainable Groundwater Management Act (SGMA) to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agency (GSAs) be formed for all high and medium priority basins

in the State. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results.

The City's potable water supply is served by the City via the Public Works Services Department. These water utilities acquire their water from groundwater basins in the area, surface water, and from importing water from surrounding utilities and water districts. While potential projects could increase water demand by increasing residential density and population, the City would need to meet this demand without increasing groundwater withdrawal significantly. Examples of achieving this would be to increase the amount of water imported, implementing water conservation measures, increase recycled water use, and/or implement groundwater recharging projects.

Future developments facilitated by the Project could potentially increase the amount of impervious surface area in the City from development of undeveloped parcels, particularly the 25.86-acre Arcadia Golf Course. As such, future development within the Arcadia Golf Course will be required to comply with the Arcadia MC §7554.9 – Stormwater Management and Rainwater Retention and implement BMPs into the landscape and grading design plans to minimize runoff and to increase on-site infiltration that recharges groundwater and improves water quality. However, a large portion of the identified candidate housing site areas have been developed into residential and non-residential uses. Because redevelopment of existing structures is a primary effort, any potential project would not significantly interfere substantially with groundwater recharge.

Additionally, construction of any potential project that would involve excavation into or below the water table would require dewatering and those dewatering operations would need to comply with all dewatering requirements to protect groundwater quality and supply. This is coupled with the BMPs that will be utilized during construction as laid out in the SWPPP to limit the amount of pollution in stormwater that recharges groundwater basins. With the proper implementation of stormwater BMPs, the impact of potential projects on groundwater resources would be minimized and these impacts would be less than significant.

- 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 storm water drainage systems or provide substantial additional sources of polluted runoff?***

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Most candidate housing candidate sites are developed and contain impervious surfaces, which direct surface flows toward existing City facilities. Due to the primarily built-out nature of the City, construction of future housing developments facilitated by the HEU would not substantially alter the existing drainage pattern through the addition of impervious surfaces. The drainage areas, as well as the drainage characteristics/patterns in the implementation condition would be similar to existing conditions.

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 all federal, State, and local requirements for avoiding impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river, including the City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8).

Considering these requirements, future housing development facilitated by the HEU would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. The City of Arcadia is located approximately 23.6 miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the Project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are in the vicinity of the City; therefore, the risk of mudflow is insignificant. Additionally, as previously noted the Federal Emergency Management Agency (FEMA) identifies the entire City of Arcadia to be in Flood Hazard Zone X, which is identified as 500-year Floodplain, an area of minimal flood hazard.²⁸

Furthermore, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for avoiding and minimizing

²⁸ FEMA. (2008). FEMA Flood Map Service Center: Search By Address. Retrieved from: <https://msc.fema.gov/portal/search?AddressQuery=arcadia#searchresultsanchor> Accessed October 12, 2021.

impacts related to flood hazards, tsunamis, or seiches, including the Arcadia GP policies and Arcadia MC codes. Considering these requirements, the future housing development facilitated by the HEU would not result in significant increased risk concerning release of pollutants due to inundation, tsunami, or seiche zones. Therefore, HEU impacts would be less than significant.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As previously noted, in 2014, the SGMA was passed, The SGMA provides authority for agencies to develop and implement groundwater sustainability plans (GSP) or alternative plans that demonstrate the water basins are being managed sustainably. As discussed under Threshold 10b, the City is unlikely to face groundwater impacts through the implementation of the Project. Therefore, future housing development facilitated by the HEU would not obstruct implementation of the Sustainable Groundwater Management Act (SGMA) and would comply with the Arcadia MC §7554.9 – Stormwater Management and Rainwater Retention.

The City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8) aims to protect water resources and improve water quality. The ordinance causes use of management practices by the city and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the State and control contribution of pollutants to City's municipal separate storm sewer systems (MS4s), and to ensure that the City is compliant with RWQCB and with applicable State and federal law.

Future developments facilitated by the HEU would be required to prepare a stormwater management plan and incorporate stormwater standards manual requirements into design documents to minimize potential impacts to water quality. Submitted materials would be required to demonstrate how the requirements of this stormwater ordinance would be met, and the permit or approval would not be approved unless the decision maker determines that the application complies.

Further, dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to comply with the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer.

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 all federal, State, and local requirements for avoiding and minimizing conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

Further, future housing development facilitated by the HEU would not prevent the City's Clean Water Program from ensuring that MS4 Permit, and Basin Plan requirements are met. As a result, future housing development facilitated by the HEU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant.

XI. Land Use and Planning

State Housing law requires that the Housing Element identify specific sites that are potentially suitable for residential development. The City has compiled an inventory of candidate housing sites, which includes properties that are dispersed throughout the community to minimize the potential for adverse changes to the neighborhood character and aesthetics and reduce the potential for adverse environmental impacts. As part of the initial site investigation, the candidate housing sites inventory encompassed six focus areas that were identified as potentially suitable areas for future housing expansion (see **Exhibit 3**). The opportunity area locations and candidate housing sites are summarized here and described later in this section

Would the Project:

a. Physically divide an established community?

Less Than Significant Impact. Projects that divide an established community can involve large scale linear infrastructure, such as freeways, highways, and drainage facilities, that bisect an established community or create barriers to movement within that community. Additionally, “local undesirable land uses,” such as prisons or landfills sites within economically depressed areas can also divide an established community.

As previously noted, the HEU does not propose any development. The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. All future housing development facilitated by the HEU would be subject to discretionary permits and would occur as market conditions allow and at the discretion of the individual property owners. However, the HEU would identify a series of implementation actions that would increase housing capacity. Future housing development would largely occur in developed areas and in areas currently zoned with allowed residential uses; therefore, an increase in housing capacity would be consistent with existing zoning and would not divide an established community. Further, 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. As well, candidate housing sites have been identified throughout the City, rather than concentrated in a single area, thus would not divide an established community. For this reason, a less than significant impact would occur.

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?

Less Than Significant Impact. The HEU includes focus areas for future housing development to meet the City’s RHNA allocation of 3,214 units. a. As noted above, 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. As part of the HEU, additional housing units would be accommodated on the candidate housing 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 the City's development review process, which may include discretionary permit approval and environmental review under CEQA, as well as, be 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; therefore, a less than significant impact would occur.

XII. Mineral Resources

Would the Project:

- 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?*

Less Than Significant Impact. According to the Arcadia GP EIR, there are no mining operations currently ongoing in the City. The Rodeffer Quarry operated at the southern end of the City from 1967 to 1990.²⁹ In 1994, the City approved the reclamation plan for the quarry that allowed the import of inert materials to fill the quarry pit.³⁰ Landfilling operations are regulated by the RWQCB, CalRecycle, the California Department of Mines and Geology (CDMG).³¹ To date, the Rodeffer Quarry is partly filled and landfilling operations are ongoing.³² The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. As previously noted, future housing development facilitated by the HEU would be subject the City's development review process, which may include discretionary permit review and approval and environmental review under CEQA, as well as, be required to comply with applicable federal, State, and local laws and local policies and regulations, as applicable to new housing development. Future housing development will also be required to adhere to Arcadia GP Goals RS-7 and Policies RS-7,1 through 7,3 which aim to prevent the loss of availability of regionally or locally significant aggregate resources. Therefore, impact would be less than significant with respect to mineral resources.

²⁹ City of Arcadia. 2010 General Plan Environmental Impact Report Section 4.10 – Mineral Resources. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/MineralResources.pdf>. Accessed November 2021.

³⁰ Ibid.

³¹ Ibid.

³² Ibid.

XIII. Noise

Would the Project:

- a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?*

Less Than Significant Impact.

Construction Noise. The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would result in construction noise generated from development activities.

In general, construction would typically involve the following construction sequences: (1) site preparation and/or demolition; (2) grading and utilities construction; (3) building construction; (4) paving; and (5) architectural coatings. Typical construction equipment would include backhoes, excavators, graders, loaders, compactors, cranes, trucks, pavers, pneumatic tools, generator sets, and air compressors. With exception to pile-driving activities, construction equipment with substantially higher noise-generation characteristics (such as rock drills and blasting equipment) would not be anticipated for construction of typical residential developments. Typical construction equipment generates maximum noise levels at 50 feet from the noise source ranging between 80 dBA for backhoes and loading trucks, to 85-90 dBA for graders and excavators, as shown in **Table 8, Maximum Noise Levels Generated by Construction Equipment** below.

Table 8: Maximum Noise Levels Generated by Construction Equipment

Equipment	Acoustical Use Factor	L _{max} at 50 Feet (dBA)	L _{max} at 100 Feet (dBA)
Concrete Saw	20	90	84
Crane	16	81	75
Concrete Mixer Truck	40	79	73
Backhoe	40	78	72
Dozer	40	82	76
Excavator	40	81	75
Forklift	40	78	72
Paver	50	77	71
Roller	20	80	74
Tractor	40	84	78
Water Truck	40	80	74
Grader	40	85	79

Equipment	Acoustical Use Factor	L _{max} at 50 Feet (dBA)	L _{max} at 100 Feet (dBA)
General Industrial Equipment	50	85	79
Notes: 1. dBA: A-weighted decibels; Lmax: maximum noise level. 2. The Acoustical Use Factor (percent) estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. Source: Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment Manual</i> , 2020.			

In general, construction noise can vary substantially from day to day, depending on the level of activity and the specific type of equipment in operation. Additionally, construction activities associated with future housing development facilitated by the HEU is anticipated to occur in incremental phases over time based on market demand, economic, and planning considerations. As a result, construction-related noise would not be concentrated in any one particular area of the City.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to comply with the Arcadia MC Chapter 6, Noise Regulation. Construction associated with future housing development facilitated by the HEU would be required to comply with the Arcadia MC §4610.3 (Noise Limits) and adhere to Arcadia GP Goal N-1 and Policies N-1,1 through N-1.5 would reduce any potential impacts with regard to noise to less than significant.

For some future housing developments, such as those near sensitive noise receptors, the City may choose to require conditions of approval to include measures under its development review process such as temporary sound barriers and shielding to reduce potential noise impacts on sensitive receptors. For example, acoustically designed enclosures and buildings can provide up to approximately 50 dBA of noise reduction, depending on the noise abatement treatments implemented. The Arcadia Noise Ordinance exempts construction noise that occurs between the hours of 7:00 AM and 7:00 PM on any day except Sundays and major holidays.

Operations Noise. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Future housing development facilitated by the HEU would result in additional housing, people, pets, and automobiles in the City. Noise would be generated by stationary operation-related sources, such as heating, ventilation, and air conditioning (HVAC) units, tankless water heaters, generators, lawn maintenance equipment, and swimming pool pumps. All future housing development facilitated by the HEU may be subject to discretionary permits and environmental review under CEQA and would be required to demonstrate compliance with Arcadia MC Chapter 6.

Noise is also likely to occur from line sources, such as motor vehicle traffic. Future housing development facilitated by the HEU would result in increased traffic volumes on local city roadways, thereby increasing cumulative noise levels. Given the City's largely developed nature, new housing development would not be expected to significantly increase traffic volume on local

roadways. Additional average daily trips (ADT) from future housing development facilitated by the HEU would need to more than double current ADT for there to be a discernable difference in noise levels (i.e., more than 3 dBA increase). Furthermore, most of the identified focus areas are within previously developed portions of the City already generating traffic volumes and mobile noises. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process. Compliance with Arcadia MC Chapter 6 would ensure future construction and operations related noise impacts would be less than significant.

b. Generate excessive ground borne vibration or ground borne noise levels?

Less Than Significant Impact. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Construction activities associated with future housing development facilitated by the HEU could result in varying degrees of groundborne vibration impacts from heavy equipment operations, depending on the construction procedure and equipment used. Construction equipment operations would generate vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

As previously discussed, the Project does not include physical alterations to the City. If proposed buildout were to occur, the additional allowable residential density at the candidate housing sites would remain within the expected population growth of the City and Region (See **Section 14: Population and Housing**). The increase in density is not anticipated to change the overall impact of growth in the City compared to what was assumed in the Arcadia GP and SCAG's Connect SoCal RTP/SCS. Any future development within the candidate housing sites would be subject to the City's standard development review process, including compliance with the City's GP, compliance with the municipal code, and site-specific CEQA review. Therefore, impacts are less than significant.

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?

Less Than Significant Impact. Currently, there are no airports within the City of Arcadia. As previously discussed, the closest airport to Arcadia is the El Monte Airport, which is located approximately 1.25 miles to the south of the City boundary. Per the Arcadia GP EIR, aircraft operations at this airport are audible at the southern section of the City, and flyovers at low levels are audible over the City of Arcadia. Future housing development within the Live Oak Corridor and the Arcadia Golf Course would be subject to the City's development review process on a case-by-case basis, which may include discretionary permit review and approval and environmental review under CEQA. The HEU is a policy document and does not directly involve housing construction. The HEU would not contain policies that would conflict with airport land use plans nor would it promote development near any airports. Therefore, less than significant impact related to exposing people to excessive as a result of airport land use would occur.

XIV. Population and Housing

Would the Project:

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City and would not directly induce any population growth. To meet the City’s RHNA allocation of 3,214 units, the HEU identifies a series of implementing actions to increase the City’s housing capacity that would induce some planned population growth in the City. As a component of Statewide housing legislation, any housing growth associated with the Project would be in accordance with State-level regulation and would therefore not be considered unplanned.

Any future housing development facilitated by the HEU would occur in urbanized locations near existing infrastructure (roads, utilities) and served by fire and other emergency responders. As shown in **Table 7**, the City has identified the total potential housing development capacity of approximately 7,222 housing units. As previously noted, because the Project does not propose physical alterations, direct population growth would not be induced solely due to the Project’s implementation.

Table 9, Population Increase from Housing Element below summarizes the projected population growth associated with the implementation of the Project and future buildout of the City’s proposed 7,222 candidate housing units.

Table 9: Population Increase from Housing Element

Definition	6 th Cycle Housing Element
Number of RHNA Allocation Units	3,214
Number of Potential Candidate Housing Units	7,222
Existing Capacity including ADUs	2,386
New Housing Units	4,836
Persons per household (<i>Department of Finance, 2020</i>)	2.86
Population (<i>Department of Finance, 2020</i>)	57,820
Total Population Forecast with HEU	71,651
Forecasted Population Increase with HEU	13,831
Population Growth Forecast by Percentage with HEU	24%
2035 Development Capacity of 2010 Arcadia GP (Maximum Buildout)	61,995
Unplanned Additional Population Growth Forecast from 2035 Maximum Buildout with HEU	9,656
Population Growth Forecast (2020-2035) percentage without HEU	7.2%
Population Growth Forecast (2020-2035) by Percentage with HEU	15.6%

Total Forecasted SCAG Population 2045	62,200
Total Forecasted SCAG Population 2045 with HEU	76,031
SCAG 2045 Population Growth Forecast Percentage with HEU	22.2%

As shown in **Table 9**, future development facilitated by the Project would therefore enable the development of a total of 7,222 additional housing units within the City. When multiplied by the Department of Finance (2020) average persons per household of 2.86, the 7,222 housing units facilitated by the HEU would generate an approximately 13,831-person population increase within the City. When combined with the 2020 total population of 57,820 persons, the City would potential grow to a total population of approximately 71,651 during this HEU planning period. This would create an approximate 24 percent increase in the 2020 population. However, the Arcadia GP EIR discussed the projected maximum population growth within the City in 2035 and estimated the maximum buildout to be approximately 61,995 persons.³³ The proposed candidate housing sites are predominantly situated in urbanized and developed areas in the City within existing land use and zoning designations, consistent with the Arcadia GP and were evaluated as part of the total planned population and housing growth in the GP. Therefore, the HEU would result in an increase of approximately 9,656 persons or 15.6 percent in unplanned population increase.

Without implementation of the Project, the City is anticipated to experience a population increase of approximately 7.2 percent to the projected 2035 maximum buildout population, as shown in **Table 9**. The HEU would result in a significant impact if it would “induce substantial unplanned population growth in an area.” While the HEU could potentially increase the population forecast by 15.6 percent, this increase would not be considered substantial as the growth would occur over an extended period and the HEU is intended to help the City meet its RHNA allocation. Future housing development facilitated by the HEU is intended to be dispersed throughout the community in areas suited for residential development. As previously discussed, future housing development facilitated by the HEU would occur incrementally through 2029, based on market conditions and other constraints.

The implementation of the HEU would potentially increase the City’s projected population estimated by the SCAG RTP/SCS. The SCAG RTP/SCS anticipates the City’s population to be 62,200 people by 2045. With the inclusion of the Project this number will be increased by 22.2 percent to reach a total of 76,031 people. As with other projections, this number is a conservative estimate based on the development of the entire set of candidate sites.

It is noted that the Project would facilitate development of affordable housing units, in accordance with State law. The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed within the City that meet these household income categories, including those working in local retail/commercial service businesses, hotels,

³³ City of Arcadia. *2010 General Plan Environmental Impact Report Section 4.12 – Population and Housing*. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Population.pdf>. Accessed November 2021.

caregivers, property caretakers, and public occupations. Therefore, job availability would not be readily affected by the implementation of the Project and would not lead to unexpected population growth.

As a component of Statewide housing legislation, any housing growth and population growth associated with the Project would be in accordance with State-level regulation and would therefore not be considered unplanned. Additionally, future housing development facilitated by the HEU would occur in urbanized locations near existing utilities and service systems, and areas already served by public services (e.g., police and fire protection, and other emergency responders).

Future housing development would be subject to discretionary permits and would be assessed on a case-by-case 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. Local requirements include those Stated in the Arcadia GP and Arcadia MC.

As discussed throughout this IS/ND, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, 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. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than significant Impact. Senate Bill (SB) 166 (2017) requires a City or County to ensure that its Housing Element inventory can accommodate its share of the regional housing need throughout the planning period. It prohibits a City or County 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 or County makes written findings supported by substantial evidence that the reduction is consistent with the adopted General Plan, including the Housing Element. The City has identified sites which can meet the 1,672 unit low and very-low income RHNA need and can also accommodate a three percent buffer for those income categories, as demonstrated in **Table 7**. The City understands that should a "No Net Loss" scenario occur during the 2021-2029 planning period and they will be required to identify additional sites to accommodate any shortfall of capacity should that scenario occur. Therefore, the HEU's potential impacts, including from future development facilitated by the HEU, concerning displacement of existing people or housing, and need to construct replacement housing elsewhere would be less than significant.

XV. Public Services

Would the Project:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 fire protection?***

Less Than Significant Impact. The Project is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the Project would increase demand for fire protection services over time. Fire protection services are provided by the Arcadia Fire Department. The Arcadia Fire Department would continue to provide services to the future housing developments facilitated by the Project.

Future development in the Arcadia Golf Course would incrementally increase the demand for fire protection services to area. However, the proposed golf course site is already being serviced by existing infrastructure (e.g., roads and utilities) and already served by the Arcadia Fire Department.

All future housing development facilitated by the HEU would be subject to development review process, which may include review pursuant to CEQA, and be required to comply with GP Goal S-5 and Policies S-5.1 through S-5.12 and to adhere to the 2019 California Fire Code and Arcadia MC §3122.7 (Fire Code). Future projects would also be subject to impact fees and tax revenue will be generated from their development. These sources of revenue will support public goods, like fire protection services, to continue and improve. Future projects will also incorporate fire preventative designs and will provide access for emergency services. The Project's impact on fire protection is anticipated to be less than significant.

- b. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 police protection?***

Less Than Significant Impact. The City receives police protection services through the Arcadia Police Department. Future residential-based Projects may slightly increase demand of protective services, but it is not expected to negatively impact the ability of the police department to provide services to the City. Similar to fire services, the identified focus areas are in urbanized locations near existing infrastructure (e.g., roads and utilities) and would be located near areas already served by the Arcadia Police Department.

As well, the addition of future development will pay development fees, as well as continued tax revenue that will support public services, such as the police officers, facilities, and supplies. All future housing development facilitated by the HEU would be subject to development review process, which may include review pursuant to CEQA, and be required to comply with GP Goal S-5 and Policies S-5.1 through S-5.12. Therefore, the Housing Element would result in a less than significant impact on police protective services.

c. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 schools?

Less Than Significant Impact. 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 unplanned population growth of approximately 13,205 persons and could generate student population growth in Arcadia Unified School District (AUSD). The student population growth would increase the demand for school services. 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. Because the construction of new school facilities to serve the future housing development facilitated by the HEU is not included in the Project, no physical impacts in this regard. Less than significant impact is anticipated to concerning construction of school facilities.

d. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 parks?

Less Than Significant Impact. Please refer to Section XVI: Recreation below.

e. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 other public facilities?

Less Than Significant Impact. 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 unplanned population growth of approximately 13,205 and would incrementally increase the demand for library facilities. Any future housing development facilitated by the HEU would occur in urbanized locations near existing facilities

that currently provide service to these areas. Therefore, it is anticipated that the increased demand would not be substantial or such that it would warrant construction of a new facility.

Although future Projects may increase demands on library facilities, demand would be at least partially offset by funding generated by development fees and by tax revenue of higher numbers of residents. Therefore, the HEU would not result in substantial adverse physical impacts associated with the provision of new library facilities. Impacts would be less than significant.

XVI. Recreation

Would the Project:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. The Project is a policy document and would not directly impact recreation for the City of Arcadia. Future residential projects may induce increased demand of parks and other recreational facilities. It is possible that future developments will include the construction of additional recreational facilities and developer-produced parks, but it is presently unknown until future housing projects are proposed. Future development facilitated by the Project would be required to pay development impact fees and any tax revenue generated will benefit the funding for parks and facilities to offset potential increases in demand.

The City of Arcadia offers a variety of recreational parks and facilities. Arcadia has mini-park/pocket parks, neighborhood parks, community parks joint use parks and facilities, and County parks and facilities. As of Arcadia's 2010 General Plan, Arcadia has a total of 32 parks, excluding 7 recreational facilities. Arcadia has a standard ratio of 2.43 acres of parks per 1,000 residents. This ratio is used for park dedication and fee requirements. The built-out nature of Arcadia's environment makes it challenging to find opportunities for more recreational facilities. According to the recommendations from the National Recreation and Parks Association (NRPA), a park should cover a ¼ to ½ mile service area radius. Arcadia satisfies this recommendation in most cases.³⁴

Additionally, the HEU's candidate housing sites are dispersed throughout the community to minimize the potential for adverse changes in the neighborhood character and reduce the potential for adverse impacts on recreation amenities. Adherence to mandatory discretionary permit requirements and regulations for providing recreation would support the City's goals for providing sufficient recreation opportunities for residents. For these reasons, the HEU and future housing development facilitated by the HEU would not result in substantial physical deterioration of existing neighborhood or regional parks. Therefore, impacts would be less than significant.

b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant. See answer (a) above. The HEU would not lead to direct impacts, but future projects that may necessitate the expansion of recreational facilities would be required to undergo environmental review and comply with any applicable discretionary actions related to

³⁴ City of Arcadia. (2010). City of Arcadia General Plan. Pages 7-4 through 7-15. Retrieved from: https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-446 Accessed October 12, 2021

the expansion of recreational facilities. As the Project does not directly propose the creation, modification, or removal of recreational facilities, a less than significant impact is anticipated.

XVII. Transportation

Would the Project:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Less Than Significant Impact. The Project is a policy document and not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Further, the HEU does not include any goals, policies, or implementation programs that would conflict with plans or other regulations that address the circulation system. Future development projects would be reviewed on a case-by-case basis to ensure consistency with applicable regulations that address the circulation system.

Bus services are provided to the City via the Los Angeles County Metropolitan Transportation Authority (LACMTA), a public agency that provides services to Los Angeles County. The LACMTA provides six (6) bus routes and four (4) Foothill Transit routes, which primarily serve the commercial areas and corridors in the City. In addition, the City also operates Arcadia Transit, which provides a curb-to-curb service in response to individual travel requests. The service is open to the general public and operates to all destinations within the City limits and give (5) designated medical facilities located beyond the City limits.³⁵ The Metro Gold Line provides light rail transit services from downtown Los Angeles to the City Azusa, with a stop in the City of Arcadia. The Metro Gold Line currently plans to extend the services from Azusa to Pomona, which is expected to be completed in 2025. Implementation of the Project would not conflict with the service capacity of these transportation providers.

All future housing development facilitated by the HEU would be subject to City's development review process, which may include environmental review under CEQA, and comply with applicable General Plan, Municipal Code, policies/standards concerning public transit and pedestrian facilities. This includes policies and regulations required to improve public access and safety for people who walk and bike, and improve the transportation system, as applicable. Future housing development on the candidate housing sites would be required to adhere to all State requirements for consistency with transportation plans.

The City's review process would examine project compatibilities with the surrounding areas. Conditions of approvals may include requirements for street improvements and dedications and traffic circulation. As a result, future housing development on the candidate housing sites facilitated by the HEU would not conflict with an adopted program, plan, ordinance, or policy

³⁵ City of Arcadia. 2010 General Plan EIR. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Transportation.pdf>, Accessed November 2021.

addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. Senate Bill 743 (SB 743) was approved by the California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor’s Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular “level of service” (LOS) for evaluating transportation projects. OPR has prepared a technical advisory (“OPR Technical Advisory”) for evaluating transportation impacts in CEQA and has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts. The Natural Resources Agency has adopted updates to CEQA Guidelines to incorporate SB 743 that requires use of VMT for the purposes of determining a significant transportation impact under CEQA.

CEQA Guidelines Section 15064.3(a) states that VMT is the most appropriate measure of transportation impacts. As such, Section 15064.3(b) provides criteria for analyzing transportation impacts. The proposed candidate housing sites could potentially result in increased traffic compared to existing conditions. Trips generated as a result of increased density or new development under the HEU have the potential to increase vehicle miles traveled (VMT) within the City. However, a majority of the proposed candidate housing sites are within urban and developed areas with existing roadways, public transit services, and infrastructures and therefore would not be expected to result in an increase in VMT. Further, future housing development in some areas of the City would provide more housing closer to employment and commercial areas, further increasing opportunities to reduce VMT and increase the ease of walking, cycling, and using public transit.

The HEU would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. The candidate housing sites are dispersed throughout the City to reduce the potential for adverse environmental impacts. The intent is to reduce impacts by placing housing near public transportation and recreation opportunities and away from environmentally sensitive resources. Future development projects would be reviewed on a case-by-case basis to ensure consistency with application regulations that address the circulation system, including Vehicle Miles Travelled (VMT).

All future housing development facilitated by the HEU would be required to adhere to all State and local requirements for avoiding significant impacts related to VMT. Any traffic demand measures required for mitigation would be required to comply with Arcadia GP Goals CI-11, CI-2, and CI-5, which encourage the maintenance of efficient roadway capacities and minimization of traffic hazards near residential uses. A less than significant is anticipated in this regard.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Because future housing development facilitated by the HEU would occur on mostly developed properties use existing roadways that are connected and adjacent to the existing transportation network, hazards due to a geometric design feature or incompatible uses are not anticipated. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and be evaluated at the project-level for its potential to increase hazards due to a geometric design feature and to verify compliance with City development requirements within the Arcadia MC.

Future housing development facilitated by the HEU would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access; and would be required to adhere to all State and local requirements for avoiding construction and operations impacts related to design and incompatible uses. As a result, future housing development facilitated by the HEU would not substantially increase hazards due to design features or incompatible uses. Therefore, impacts would be less than significant.

d. Result in inadequate emergency access?

Less Than Significant Impact. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Because future housing development facilitated by the HEU would occur on mostly developed properties, it is not anticipated that future housing development would result in inadequate emergency access. Additionally, all future housing development facilitated by the HEU would be subject to the City's development review process and required to demonstrate consistency with the Arcadia GP and Arcadia MC.

The City has adopted the California Fire Code (CFC) under Arcadia MC §3122.11. The CFC sets standards for road dimension, design, grades, and other fire safety features. Additionally, more stringent CBC standards also apply regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Future housing development would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access. Thus, compliance with the Arcadia MC would ensure adequate access issues, including emergency access. As a result, future housing development facilitated by the HEU would not result in inadequate emergency access. Therefore, impacts would be less than significant.

XVIII. Tribal Cultural Resources

Would the Project:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less Than Significant with Mitigation. Pursuant to Government Code §21080.3.2(b) and §21074(a)(1)(A) -(B) (AB 52) the City has provided formal notification to California Native American tribal representatives that have previously requested notification from the City regarding projects within the geographic area traditionally and culturally affiliated with tribe(s). Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. To determine whether there are sensitive or sacred Native American resources on or near that site that could be affected by the HEU, the City also requested the NAHC to perform a Sacred Lands File (SLF) search. The NAHC utilizes the United State Geological Survey (USGS) Geologic Maps as reference for the search. On June 1, 2021, the City received the negative result of the Sacred Lands File (SFL) from the Native American Heritage Commission (NAHC). On June 10, 2021, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18. No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18.

XIX. Utilities and Service Systems

Would the Project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less Than Significant Impact.

Water

The City is the sole provider of water and provides water services to over 50,000 people. The City owns and operates its water distribution system through the Public works Services Department. The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would be located in developed areas of the City where water infrastructure already exists. Further, most of the candidate housing sites are developed and include existing connections to the District's system. Accordingly, future housing development facilitated by the HEU is not anticipated to require or result in the relocation or construction of new or expanded water facilities that could cause significant environmental effects. Notwithstanding, 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 General Plan policies and Arcadia MC regulations. A less than significant impact would occur. Water supply is further discussed in impact discussion (b) below.

Wastewater

Future projects may be required to implement a Water Pollution Prevention Program (SWPPP) to ensure that water quality is not degraded and so that storm water flowing from the site would not exceed wastewater treatment requirements. The Santa Ana Regional Water Quality Control Board (RWQCB) also has requirements. Wastewater from the City is treated by the Whittier Narrows Water Reclamation Plant (WNWRP), the San Jose Creek Water Reclamation Plant (SJCWRP), and the Joint Water Pollution Control Plant (JWPCP), however, the percentage breakdown between these three plants in treating the City's wastewater is unknown. The Los Angeles County Sanitation Districts (LACSD) estimates approximately 69 gallons of wastewater is generated per person per day within LACSD's service area. Based on a 2020 population of 53,998 within the City, the estimated amount of wastewater collected within the City's service area is approximately 3.7 million gallons (MG) per day (or approximately 4,200 AFY).³⁶ The City is

³⁶ City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 6-40 through 6-41. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

expected to be able to accommodate future projects, such as those proposed under the Project. Impacts are less than significant. Wastewater capacity is further discussed in impact (c) below.

Dry Utilities

Southern California Edison (SCE) provides electricity and Southern California Gas Company (SoCal Gas) services gas utilities. Telecommunications service is provided by AT&T.³⁷ The project would not result in direct housing construction but would facilitate future housing development throughout the City. The housing development facilitated by the HUE would increase the demands for dry utilities. However, the candidate housing sites are located in developed areas of the City that are already served by electric power, natural gas, and telecommunications facilities. Further, most of the candidate housing sites are developed and connect to existing dry utility infrastructure. While future development facilitated by the HEU would increase population within the City and increase service demand, growth projections are consistent with regional and local plans used to guide infrastructure development. All future housing development facilitated by the HEU would be required to meet the mandatory requirements under the City's various programs aimed at ensuring adequate supplies and service infrastructure are available to serve the development. A less than significant impact would occur.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. According to the 2021 City of Arcadia Urban Water Management Plan (UWMP), the City's per capita water usage rate is approximately 230 gallons per day (gpd).³⁸ The Project would therefore generate a demand of 3,992,800 gpd or approximately 4,428 acre-feet (AF) of water per year (AFY). This would constitute approximately 32 percent of the current water demand of 13,935 AF.³⁹ During dry years, City is able to source water from the Raymond Basin Area and the Main Basin Area. As well, the City's diverse water supply (imported water, surface water, and groundwater) is anticipated to provide an adequate water supply through 5 dry years.⁴⁰ Because the Project is a required component of Statewide planning efforts, the increased water demands, and supply would be increased as a result. Notwithstanding, all future housing development facilitated by the HEU would be subject to environmental review under

³⁷ City of Arcadia. (2010). *Arcadia General Plan Update Draft Program EIR*. Page 4.16-1. Retrieved from: https://www.arcadiaca.gov/shape/development_services_department/planning___zoning/general_plan.php#outer-708

³⁸ City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 4-13. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

³⁹ City of Arcadia. (2020). *City of Arcadia 2020 Urban Water Management Plan*. Retrieved from: <https://www.arcadiaca.gov/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> Accessed October 12, 2021

⁴⁰ City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 7-6. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

CEQA, the City's development review process, and required to adhere to General Plan policies and Arcadia MC regulations. A less than significant impact would occur.

Stormwater

Implementation of future projects will likely require the construction of storm drainages to tie into existing stormwater drainage facilities within existing rights-of-way. Water discharged from the site will not negatively affect off-site or downstream flows. See Hydrology and Water Quality Impact (a) for further discussion. Impacts are to be considered less than significant.

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 projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The City is served by the Whittier Narrows Water Reclamation Plant (WNWRP), the San Jose Creek Water Reclamation Plant (SJCWRP), and the Joint Water Pollution Control Plant (JWPCP), however, the percentage breakdown between these three plants in treating the City's wastewater is unknown. LACSD estimates approximately 69 gallons of wastewater is generated per person per day within LACSD's service area. Based on a 2020 population of 53,998 within the City, the estimated amount of wastewater collected within the City's service area is approximately 3.7 million gallons (MG) per day (or approximately 4,200 AFY).⁴¹

Future housing development under the HEU would be subject to discretionary permits and required to adhere to all federal, State, and local requirements related to wastewater treatment during construction and operations, including the City's Sewer System guidelines (Arcadia MC Chapter 4) and required construction permits. Considering these requirements, and the available capacity discussed above, the project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No new expansions of infrastructure facilities are required, and impacts would be less than significant. No direct physical impact to the environment would occur.

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?

Less Than Significant Impact. Trash and recycling services are provided by multiple companies within the City. Solid waste generated during construction activities typically includes demolition of existing on-site structures, vegetation clearing, and grading would generate solid waste. Such waste would be source separated on-site for reuse, recycling, or proper disposal. The nearest

⁴¹ City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 6-40 through 6-41. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

landfill to the City is the Puente Hills Landfill and Materials Recovery Facility (MRF). However, this facility is currently closed. The next nearest facility is the Scholl Canyon Landfill, approximately 6.9 miles west of the City.

Under the Project, it is not expected that future projects will lead to inadequate landfill capacity at the Scholl Canyon Landfill, which has a daily capacity of 3,400 tons per day. The landfill has the capacity for 58.9 million cubic yards and has an operational life through 2030.⁴² Solid waste generated at future housing developments facilitated by the HEU would represent a nominal increase in disposal rates. Existing landfill capacity would be sufficient to serve future development within the City.

Further, AB 341 requires Cities and Counties to implement recycling programs, reduce refuse at the source, and compost waste to achieve the established 75 percent diversion of solid waste from landfills. Waste disposal is handled by multiple franchised waste haulers within the City. For future development, the City, in conjunction with those approved waste haulers, would perform outreach, education and monitoring pursuant to this regulation.

Future housing development facilitated by the HEU would be subject to the City's development review process, which may include discretionary permit review and approval; as well as environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for solid waste reduction and recycling. Considering these requirements, the HEU implementation would not generate solid waste in excess of State or local standards, or in excess of local infrastructure's capacity. Therefore, impacts would be less than significant.

e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. State, County, and local agencies with regulatory authority related to solid waste include the California Department of Resources Recycling and Recovery (CalRecycle) and the City. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), Section 4.408 of the CalGreen Code, and SB 341, which requires multi-family residential development and commercial uses to implement recycling programs.

The Integrated Waste Management Act, which requires every City and County in the State to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, identifies how each jurisdiction will meet the State's mandatory waste diversion goal of 50 percent by and after the year 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341.

⁴² CalRecycle. (2011). SWIS Facility/Site Activity Details Scholl Canyon Landfill (19-AA-0012). Retrieved from: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3531?siteID=1000> Accessed October 12, 2021

The 2019 CalGreen Code Section 4.408 requires preparation of a Construction Waste Management Plan that outlines ways in which the contractor would recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. During the construction phase of future housing development, projects would comply with the CalGreen Code through the recycling and reuse of at least 65 percent of the nonhazardous construction and demolition debris from the project site. No conflict with statutes and regulations related to solid waste would occur.

XX. Wildfire

Would the Project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Undeveloped Areas are more likely to be high fire risk areas. Infill development will be proposed and prioritized through the housing element. These areas are in developed areas which reduces risk for wildland fire in the wildland urban interface. It is unlikely that emergency services traveling from the city to undeveloped areas and edges of the city will be impeded by construction activities or increased traffic created as a result of residential development under the housing element.

According to CalFire Fire Hazard Severity Zone Map⁴³, most candidate housing sites, except those in the northernmost portion of the City, are not within a State responsibility area or a Very High Fire Hazard Severity Zone. However, future developments facilitated by the Project would be required to continue assessing potential fire risks associated with their individual developments. The established permitting process will assist future developers in further identifying any potential construction barriers or obstructions in the rights of way and paths for emergency access. Future developments may require the creation of a traffic control plan which will mitigate any concerns related to impeding emergency access. Fire prevention measures are also included in Goal S-3 of the Arcadia GP.

Furthermore, future development facilitated by the HEU would be subject to discretionary permits and required to meet the mandatory requirements related to the prevention of wildfire impacts. All future housing development would be required to comply with e CFC and CBC. As a result, HEU implementation would not substantially impair an adopted local or county-wide emergency response or evacuation plan. Therefore, impacts would be less than significant.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildlife or the uncontrolled spread of a wildfire?

Less Than Significant Impact. To further minimize risk from wildfire, future development on the candidate housing sites in high hazard severity zones are required to adhere to the 2019 California Fire Code, Title 24, Part 9, §304.1.2, which States the following:

- “Any person that owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-covered lands, brush covered lands,

⁴³ California Department of Forestry and Fire Protection, California Fire Hazard Severity Zone Viewer Available at: <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>, Accessed February 5, 2021.

or grass-covered lands, or any land which is covered with flammable material, shall at all times do all of the following:"

- Maintain around and adjacent to such building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This section does not apply to single specimens of trees, ornamental shrubbery, or similar plants which are used as ground cover, if they do not form a means of rapidly transmitting fire from the native growth to any building or structure.
- Maintain around and adjacent to any such building or structure additional fire protection or firebreak made by removing all bush, flammable vegetation, or combustible growth which is located from 30 feet to 100 feet from such building or structure or to the property line, whichever is nearer, as may be required by the enforcing agency if he finds that, because of extra hazardous conditions, a firebreak of only 30 feet around such building or structure is not sufficient to provide reasonable fire safety. Grass and other vegetation located more than 30 feet from such building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion.
- Remove that portion of any tree which extends within 10 feet of the outlet of any chimney or stovepipe.
- Cut and remove all dead or dying portions of trees located adjacent to or overhanging any building.
- Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.
- Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than 0.5 inch in size.
- Hazardous vegetation and fuels around all applicable buildings and structures shall be maintained in accordance with applicable regulations.⁴⁴

⁴⁴ California Office of Administrative Law (2019). *2019 California Fire Code, Title 24, Part 9, §304.1.2*. Retrieved from <https://codes.iccsafe.org/content/CFC2019P4/chapter-3-general-requirements>. Accessed on August 25, 20201.

Future development facilitated by the Project would be required to adhere to all applicable fire prevention requirements and regulations, including California Fire Code requirement and would result in less than significant impacts.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. As previously noted, the project would not result in direct housing construction but would facilitate future housing development. The need for installation and maintenance of new infrastructure (such as roads, fuel breaks, emergency water resources, power lines, or other utilities) would be evaluated as part of the discretionary development permit review process. It is anticipated that future housing development facilitated by the Project would be served by the extension of existing utility infrastructure located primarily in existing rights-of-way, because of the predominately developed nature of the City. Through compliance with applicable development regulations in the case of future development, impacts are anticipated to be less than significant, and no mitigation is required.

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?

Less Than Significant Impact. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. According to the California Geological Survey, The City does not contain any areas identified as having a severe potential for landslides.⁴⁵ As well, as Stated in Geology and Soils Impact (a)(iv), The Project candidate housing focus areas are relatively flat and not within an area susceptible to landslides. Adherence to State and City codes, and emergency and evacuation plans set by the City and the County of San Bernardino would prevent impacts to people or structures from risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

⁴⁵ California Geological Survey, Geologic Hazards Data and Maps Data Viewer. Available at <https://maps.conservation.ca.gov/geologichazards/>. Accessed October 12, 2021

XXI. Mandatory Findings of Significance

Would the Project:

- a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

Less Than Significant Impact. On the basis of the foregoing analysis, the proposed project does not have the potential to significantly 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 or 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. All future housing development facilitated by the HEU would be subject to the City's development review process and required to adhere to all federal, State, and local requirements. The HEU would not result in any direct environmental impacts that would 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. Impacts are less than significant.

- b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)***

Less than Significant Impact. State CEQA Guidelines §15065(a)(3) defines "cumulatively considerable as times when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." This document provides a programmatic analysis of the effects of the proposed HEU and the future housing development facilitated by its implementation.

The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would occur as market conditions allow and at the discretion of the individual property owners; be subject to the City's development review process; be

subject to environmental review under CEQA; and does not propose changes to current land use designations and zoning. Based on these factors, and since all future housing development facilitated by the HEU would be subject to the City's development review process, the project would not result in environmental effects, which are individually limited, but cumulatively considerable.

c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. There are no known substantial adverse effects on human beings that would be caused by the proposed project. The project would facilitate future housing development throughout the City but would not result in direct housing construction. The HEU provides capacity for future housing development consistent with State Housing law. The candidate housing sites are dispersed throughout the community to minimize the potential for adverse environmental impacts. The provision of additional housing in the City is intended to create adequate housing availability at all income levels. The creation of more economically and socially diversified housing choices is a goal of the HEU and is intended to provide new housing opportunities for low-income households. Implementation of the HEU would provide additional housing options for a variety of income levels, as allocated by RHNA.

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