

INITIAL STUDY & NEGATIVE DECLARATION FOR THE ALHAMBRA HOUSING ELEMENT PROJECT

Prepared for:

City of Alhambra
111 S. First Street
Alhambra, CA 91801

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TABLE OF CONTENTS

Section Title	Page
1.0 Environmental Checklist Form	IS-1
2.0 Potential Environmental Impacts	IS-19
3.0 List of Preparers	IS-80
4.0 References.....	IS-81
5.0 Terms, Definitions, and Acronyms	IS-83

List of Figures

Figure Title	Page
1 Regional Location Map.....	IS-6
2 Project Location Map	IS-7
3 General Plan Land Use Designation Map.....	IS-13
4 Zoning Map	IS-14
5 Districts and Specific Plan Map	IS-15
6 Landslide Potential Map.....	IS-40

List of Tables

Table Title	Page
1 2021-2029 Alhambra RHNA Allocation	IS-4
2 Forecast Population and Housing Growth	IS-5
3 Land Use Designations	IS-9
4 Zoning Code	IS-11
5 City Noise Standards (dBA)	IS-56

Appendices

- A Information Request Letters
- B Responses for Information Request Letters
- C NAHC Response Letter
- D Tribal Notification Letters

1.0 ENVIRONMENTAL CHECKLIST FORM

INITIAL STUDY CHECKLIST

1. Project Title:

Alhambra Housing Element Update

2. Lead Agency Name and Address:

City of Alhambra
111 S. First Street
Alhambra, CA 91801

3. Contact Person and Email:

Vanessa Reynoso, Deputy Director
(626) 570-5033

4. Project Location:

The Project location encompasses the entire City of Alhambra (City), which is located on the western edge of the San Gabriel Valley, within the County of Los Angeles (County). The City of Alhambra is surrounded by the City of Los Angeles to the west, City of South Pasadena and City of San Marino to the north, City of San Gabriel and City of Rosemead to the east, and the City of Monterey Park to the south. The City covers approximately 7.6 square miles.

5. General Plan Designation:

The Project site encompasses the entire area within the City boundary. As such, the Project includes all General Plan designations. Existing zoning is described under the *7-Description of Project* heading.

6. Zoning:

The Project site encompasses the entire area within the City boundary. As such, the Project includes assessment of all zoning within the City limits. Existing zoning is described under the *7-Description of Project* heading.

7. Description of Project:

Introduction

The Housing Element is one of eight State-mandated elements a City is required to prepare as part of its General Plan. Enacted by law in 1969, the Housing Element identifies a City's housing conditions and needs using the Regional Housing Needs Assessment (RHNA) allocation provided by the regional Metropolitan Planning Organizations (MPOs). The Housing Element then establishes the goals, objectives, policies, and programs that serve as the foundation for the City's housing strategy to achieve specific housing goals and improve local housing conditions.

Pursuant to Government Code Section 65584,¹ the Housing Element should further all of the following objectives:

1. 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.
2. 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 Section 65080.
3. 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.
4. 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.
5. Affirmatively furthering fair housing.

The City is updating the Housing Element to address housing needs for the October 2021 to October 2029 Planning Period.

New Legislation

Since the City adopted its current Housing Element on November 2013, the State has adopted legislation to strengthen State requirements for increasing housing site inventory in California, with a focus on affordable housing, as summarized below:

Affirmative Furthering Fair Housing (Assembly Bill [AB] 686)

AB 686 requires all State and local agencies to create laws, programs, and activities to further fair housing, and no actions are inconsistent with the obligation to provide fair housing in the State. Effective January 1, 2019, all Housing Elements are required to include fair housing analysis to ensure all State and local agencies are affirmatively furthering fair housing practices. Under State law, affirmatively furthering fair housing means “taking meaningful actions, in addition to combatting discrimination, that

1 California Legislative Information. Government Code Section 65580- 65589.11.
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=65584.
Accessed May 2021.

overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Enhanced Requirements Realistic Development Potential (AB 1397)

AB 1397 builds on existing laws and imposes further requirements on State and local agencies to ensure land identified for residential development in the Housing Element will be made available for development for the duration of the Housing Element implementation period. AB 1397 requires that Housing Elements identify the number of units that can realistically be accommodated on sites identified for housing and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing must be identified. Studies to show sufficient utility services to support the additional housing units must also be made available.²

Methodologies for identifying realistic development of nonvacant sites were modified to consider existing use, past development trends, market conditions, and the availability of regulatory and/or other development incentives. The nonvacant sites are presumed to impede additional residential development, unless the Housing Element describes findings based on substantial evidence that the use will likely be discontinued during the planning period.

No Net Loss (Senate Bill [SB] 166)

SB 166 builds on existing laws and regulations to ensure a local agency meets its allocated housing units for lower and moderate-income households. This bill requires adequate housing development capacities to be available throughout the Housing Element planning period to meet the unmet RHNA needs. SB 166 prevents a local jurisdiction from permitting an identified lower and moderate-income residential housing site for development of another use or for a lower density residential development than identified in the Housing Element. If a site identified for housing development is permitted for another use or developed at a lower density which prevents the local agency from meeting its RHNA for lower and moderate-income residential housing allocation numbers, the local agency must identify another site for housing development within 180 days to meet the RHNA allocation for lower and moderate-income housing.³

Regional Housing Needs Assessment Allocation

State Housing Law mandates that MPOs develop RHNA allocations based on the regional determination figure issued by the California Department of Housing and Community Development (HCD) as part of the process for updating local housing elements of the General Plan. The RHNA quantifies the housing need

2 California Legislative Information. AB-1397 Local Planning: housing element: inventory of land for residential development. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1397. Accessed March 2021.

3 California Legislative Information. SB-166 Residential Density and Affordability. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB166. Accessed May 2021.

within each jurisdiction during specific planning periods and local governments use the RHNA allocations provided by the MPOs in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. RHNA allocations are determined and updated every eight years to facilitate the update of Housing Elements on the local level every eight years. The eight-year planning periods for RHNA allocation are defined as RHNA cycles with the latest update for the 2021-2029 planning period considered the 6th RHNA allocation cycle. The 2021-2029 RHNA allocation considers the existing housing needs along with future housing needs which differs from previous RHNA allocation cycles that only considered future housing needs.

As shown in *Table 1-2021-2029 Alhambra RHNA Allocation*, the City was assigned a total need of 6,825 housing units, including 1,774 very low-income units, 1,036 low-income units, 1,079 moderate-income units, and 2,936 above moderate-income units.^{4,5} The City is mandated by State Housing Element Law to demonstrate it has adequate sites available through appropriate zoning and development standards and with the required infrastructure for a variety of housing types and income levels. The City must demonstrate it has capacity or adequate sites to accommodate the projected need for housing through the 2021-2029 RHNA planning period.

TABLE 1 2021-2029 ALHAMBRA RHNA ALLOCATION		
Income Category	Units	% of Total
Very Low Income Units	1,774	26%
Low Income Units	1,036	15%
Moderate Income Units	1,079	16%
Above Moderate Income Units	2,936	43%
Total Units	6,825	100%

Source: Southern California Association of Governments (SCAG). 6th Cycle Regional Housing Needs Assessment Final Allocation Plan. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1616462966>. Accessed May 2021.

Project Setting

Regional Setting

The City is located in the Southern California Association of Governments’ (SCAG) region, which is the largest MPO in the country, including approximately 19 million people.⁶ The region contains six counties: Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County. Today, the region contains 6 million households and 8 million jobs. While the growth

4 Southern California Association of Governments (SCAG). 6th Cycle Regional Housing Needs Assessment Final Allocation Plan. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1616462966>. Accessed May 2021.

5 Southern California Association of Governments (SCAG). Regional Housing Needs Assessment. RHNA Final Allocation. <https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>. Accessed May 2021.

6 Southern California Association of Governments (SCAG). Connect SoCal- The 2020-2045 RTP/SCS. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176. May 2021.

trend has slowed in recent years due to a combination of factors, the region’s population continues to grow at approximately 0.85% annually, or by approximately 161,500 people annually. Population growth is projected to slow, but continued growth through 2045 is expected. This population growth in turn translates into continued growth for the number of households and jobs in the region.

As illustrated in *Figure 1-Regional Location Map*, the City is located near the center of Los Angeles County (County). The County encompasses approximately 4,083 square miles including the San Clemente and Santa Catalina islands. The County contains a population of approximately 10 million people with roughly 9 out of 10 people living in incorporated cities and 1 out of 10 people living in unincorporated areas of the County.⁷ As of 2019, there are approximately 3.6 million households in the County with approximately 3.9 million local jobs. The RHNA allocation for the 2021-2029 planning period for the County is 812,060; with 217,273 for Very-Low Income housing, 123,022 for Low Income housing, 131,381 for Moderate Income housing, and 340,384 for Above Moderate Income housing.⁸

Local Setting

As shown in *Figure 2-Project Location Map*, the City is situated at the western edge of the San Gabriel Valley, adjacent and east of the City of Los Angeles. Other bordering cities include South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. The City encompasses 4,899 acres of land which is the second largest city in the San Gabriel Valley. The City is connected to the wider Los Angeles region through the Long Beach Freeway (I-710) which begins in the Alhambra city limits and runs south through the City of Long Beach and the San Bernardino Freeway (I-10) which traverses east to west through the southern portion of the city limits.

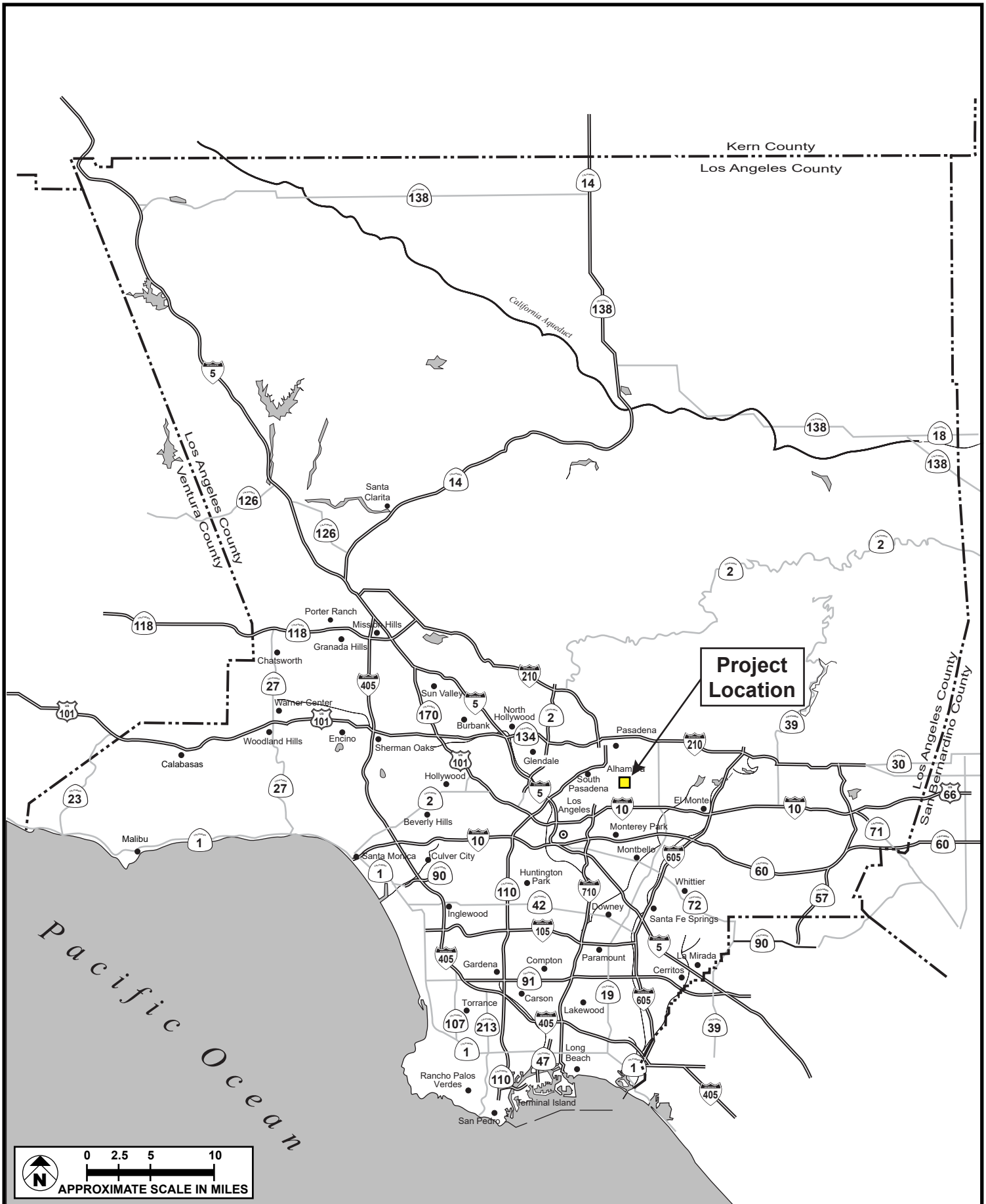
Current and forecast population, households, and employment for the City is shown in *Table 2-Forecast Population and Housing Growth*.

TABLE 2 FORECAST POPULATION AND HOUSING GROWTH			
Year	Population	Households	Employment
2012	84,000	29,300	28,000
2016	86,600	29,900	37,400
2045	91,200	32,000	40,600
Increase, 2016-2045	4,600	2,100	3,200

Source: SCAG. Final Connect SoCal Demographics and Growth Forecast-2016-2040 Regional Transportation Plan & Sustainable Communities (RTP/SCS). Accessed June 2021. (2012 data) SCAG. Final Connect SoCal Demographics and Growth Forecast-2020-2045 RTP/SCS. Accessed June 2021. (2016, 2045 data)

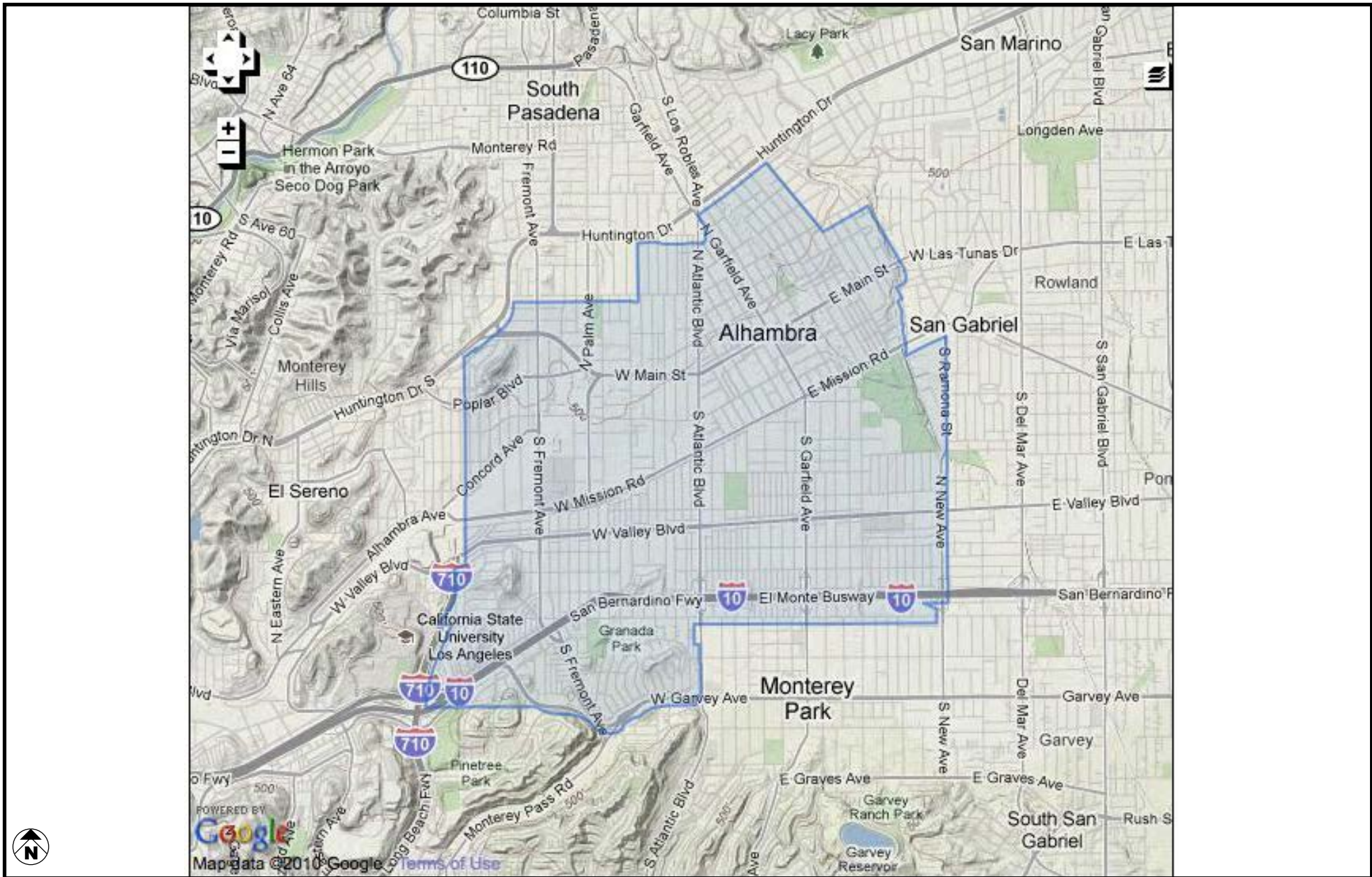
7 Los Angeles County. General Plan-Chapter 4: Background. https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch4.pdf. Accessed June 2021.

8 Southern California Association of Governments (SCAG). SCAG 6th Cycle Proposed Final RHNA Allocation. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614023284>. Accessed May 2021.



SOURCE: Meridian Consultants, LLC - 2021

FIGURE 1



SOURCE: Google Earth - 2021

FIGURE 2



Project Location Map

According to SCAG's 2020-2045 Regional Transportation Plan & Sustainable Communities (RTP/SCS) data Alhambra's population is anticipated to increase by approximately 4,600 from 86,600 to 91,200 from the year 2016 to year 2045. Similarly, the number of households in the City is anticipated to increase from 29,900 in 2016 to 32,000 in 2045 and the number of employment will increase from 37,400 in 2016 to 40,600 in 2045. These numbers are consistent with the continued growth from year 2012 to year 2016.

Applicable Plans

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal or the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, nonprofit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura.

Connect SoCal is an important planning document for the region, allowing project sponsors to qualify for federal funding. The plan takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness. As part of the 2020-2045 RTP/SCS, SCAG also developed the 6th cycle RHNA allocation plan which will cover the planning period for October 2021 through October 2029.

Communities use RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. RHNA allows communities to anticipate growth, so that collectively the region and the subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and addresses social equity and fair share housing needs.

Alhambra General Plan

As mentioned previously, State law requires all California local governments, including counties and cities, to prepare a General Plan including seven mandated elements, with two additional elements that apply to certain local jurisdictions. The role of a general plan is to establish a document that will "act as a 'constitution' for development, the foundation upon which all land use decisions are to be based. It expresses community development goals and embodies public policy relative to the distribution of future land use, both public and private," according to the 2003 General Plan Guideline.⁹

In 2015, the City kicked off its Comprehensive General Plan Update. After extensive community outreach and several public hearings, the City Council unanimously approved the Comprehensive General Plan on August 12, 2019. The updated General Plan includes seven chapters: Introduction, Land Use & Community Design, Mobility, Quality of Life, Resources, Services & Infrastructure, and Health & Safety. The City will

9 2003 General Plan Guideline.

adopt the General Plan Housing Element separately. The Housing Element needs to be consistent with the rest of the General Plan elements.

General Plan Land Use Designations

The City spans 4,899 acres, with residential land use designations making up approximately 52% of the City’s current land area. Rights-of-way, including streets and alleyways, account for about 25% of the City’s existing land use. Other land use designations include institutional, commercial, industrial, and open space which includes parks, a golf course, and street medians. A list of all land use designations and the corresponding land use percentage in the City can be found in *Table 3-Land Use Designations*.

Generally, the southern half of the City is developed at lower intensity with mostly low- and medium-density residential uses. The northern half of the City has higher density residential uses along with a variety of commercial uses, including relatively high intensity development along portions of Main Street. *Figure 3-General Plan Land Use Designation Map* shows the locations of the different General Plan land use designations within the city limits.

TABLE 3 LAND USE DESIGNATIONS	
Land Use Designations	%age of Land
Low Density Residential	32%
Rights Of Way	25%
High Density Residential	12%
Medium Density Residential	8%
Open Space	4%
Industrial	4%
Institutional	4%
Commercial	4%
Specific Plan	3%
Office/Medical Office	2%
Public Facilities	1%
Central Business District	1%
Parking	<1%
Total	~100%

Source: City, Alhambra General Plan. August 2019.

Residential Land Uses: There are three residential land use designations which are defined to meet General Plan policies for housing demand in the City. A Residential Planned Development (RPD) permit is required for all new housing development in Alhambra. Multiple zones may apply to each residential land use category and no designations require development at the maximum density.

- Low Density Residential (1-5 units per acre): Principally areas for single-family, detached residential development. The designation applies to currently developed areas with established, strong neighborhood identity. Southern half of the City, including areas south of Mission Road, consists primarily of this land use. Pockets of the City north of Mission Road also contains this land use designation.
- Medium Density Residential (6-12 units per acre): Housing types in this designation include single-family detached units, duplexes, triplexes, and four-plexes. The designation defines areas developed to medium-density but intended to preserve a lower-density character and appearance. Land designated as this land use type can be found in areas throughout the City.
- High Density Residential (13-24 units per acre): This designation accommodates a variety of multifamily housing types, including garden-style units and townhouses. Development proposals in the high-density range will be reviewed to ensure that they meet the intent of the General Plan. Areas with this designation is anticipated to increase as a result of land recycling into higher density uses. High Density Residential designation is primarily in the north-central portion of the City.

Commercial Land Uses: Six commercial land use designations are defined to meet General Plan policies for commerce in the City. Commercial Planned Development (CPD) permits are required for development in all commercial land use designations because of the potential land use conflicts that could result from extensive strip commercial development along major arterials. The six commercial land use designations are: General Commercial, Automotive Commercial, Regional Commercial, Central Business District, Office Professional, Medical Office.

Industrial: The Industrial designation accommodates a variety of industrial activities that are nonpolluting and can co-exist with adjacent land uses. This land use designation also accommodates commercial uses with the approval of a conditional use permit.

Parking: This designation is intended to serve commercial areas at the intersections of major arterials, the downtown area, and Valley Boulevard. The goal of this designation is to provide public parking in commercial areas.

Public Facilities: The Public Facilities' designation is intended to provide for the orderly development, use, and operation of buildings and other facilities operated and under the control of a public agency.

Open Space: This designation accommodates public open space and recreational activities. Parkland is the main source of open space.

Institutional: The institutional land use category serves public and private schools and support facilities from kindergarten through high school, as well as adult schools, higher education professional schools, and religious facilities.

City Municipal Code (AMC)

Zoning Code

The Alhambra zoning code coordinates all existing zoning regulations and provisions into one comprehensive zoning plan in order to designate, regulate, and control the location and use of buildings, structures and land for residence, commerce, trade and industry or other purposes. The zoning code regulates the dimension, number of stores, and other related components of a building, structure, or land to ensure the most appropriate use of land and to protect and promote the health, safety, and general welfare of the public.

As displayed by *Figure 4-Zoning Map*, the City has 11 distinct zoning designations outside of overlay zone districts and specific plans. The 2021-2029 Housing Element update encompasses the entire city limits and will take into account all existing zoning and developmental uses when identifying areas for increasing housing production. *Table 4-Zoning Code* details existing zoning in the City.

TABLE 4 ZONING CODE		
Zoning Code	Description	Permitted Uses
R-1	Single-Family Residential	32%
R-2	Limited Multiple-Family Residential	25%
R-3	Multiple-Family Residential	12%
P	Parking	8%
PO	Professional Office	4%
CBD	Central Business District	4%
CPD	Commercial Planned Development	4%
EMC	East Main Commercial	4%
IPD	Industrial Planned Development	3%
OS	Open Space	2%
PF	Public Facilities	1%
Total		~100%

Source: City, Alhambra General Plan. August 2019.

Districts and Specific Plans

Aside from General Plan land use designations, the City has also adopted 10 specific plans to govern development in various parts of the Alhambra city limits. Alhambra uses specific plans as a tool for the systematic implementation of a jurisdiction’s General Plan area by area, for implementation of development standards within a defined area.

Alhambra also adopted three zoning overlay districts which are located towards the northern half of the City. These overlay districts are placed over an existing base zone which identifies special provisions in addition to those in the underlying base zone. Overlay zones are used as tools to help defined areas reach specific outlined goals. Any proposed development within the overlay zone and specific plan areas would be required to comply with standards defined within the overlay zone districts and specific plans. The location of the 10 specific plans and 3 overlay districts are presented in *Figure 5-Districts And Specific Plan Map*.

2021-2029 Housing Element Update

Housing Goals

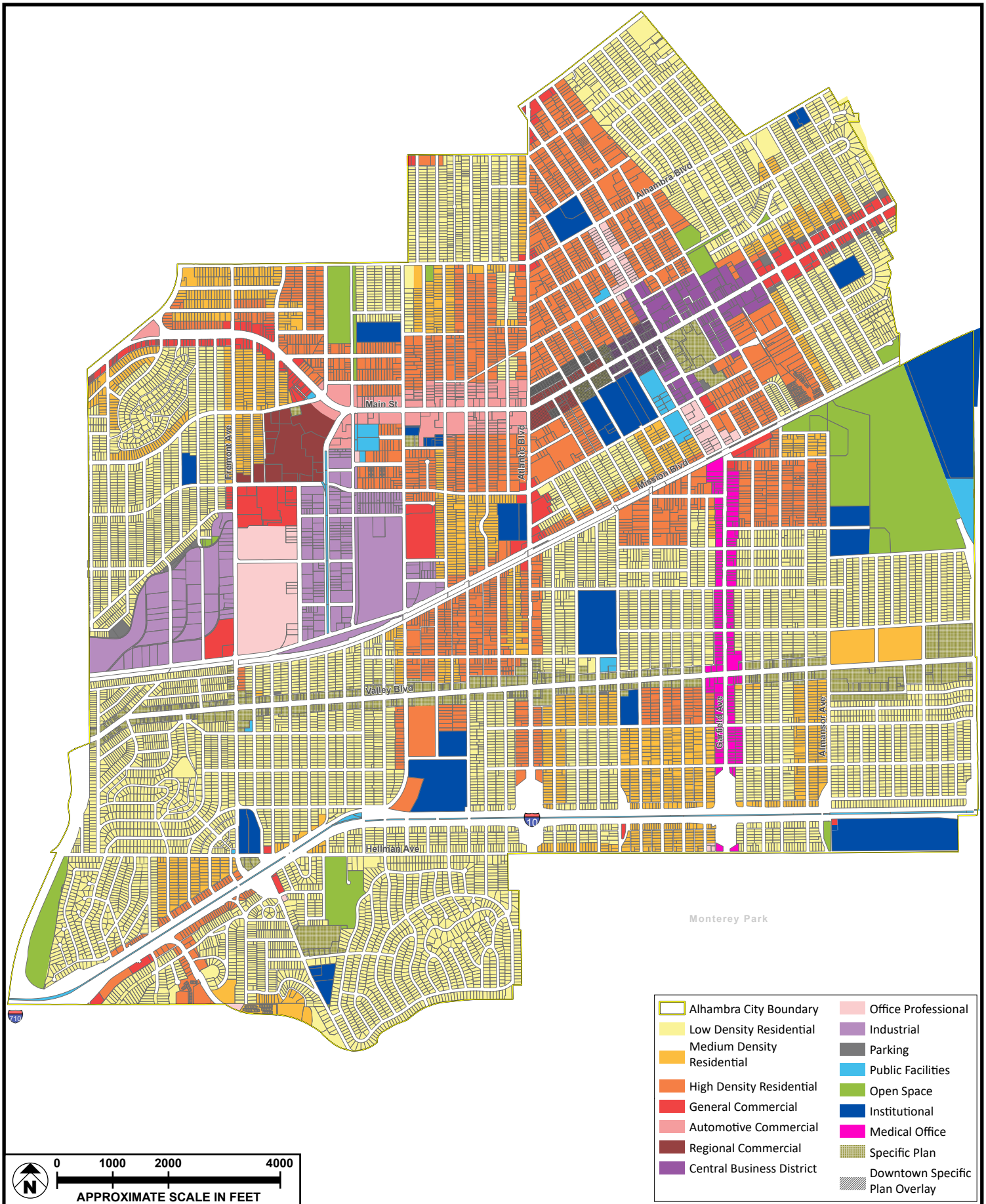
As required by State law, the 2021-2029 Housing Element Update will include a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA. This effort includes the identification of multiple strategies to assist the City in accommodating an additional 6,825 housing units, including 1,774 very low-income units, 1,036 low-income units, 1,079 moderate-income units, and 2,936 above moderate-income units. The City is highly developed with insufficient vacant land to accommodate substantial housing development without land recycling. Only 5.5 acres of vacant land zoned for housing currently exists within the Alhambra city limits. The 5.5 acres of vacant land would only support up to 58 units of total housing. Because of this, seven Housing Goals have been developed to address the housing unit shortfall for the 6th Cycle planning update while addressing concerns regarding affirmative furthering of fair housing, in line with the goals of AB 686. General descriptions of these strategies are described below.

Goal 1: **Preservation and improvement of the existing supply of housing and prevention of displacement among existing tenants.**

The goal is to ensure existing housing stock in Alhambra are properly repaired and rehabilitated to help conserve and improve affordable housing in the City. Programs under this goal include housing rehabilitation programs for existing housing, code enforcement to ensure proper property maintenance and preservation, and preservation of at-risk rental housing that are especially targeted for housing units reserved for low-income renters.

Goal 2: **Assist in the maintenance and production of a wide range of housing types to meet existing and future housing needs in the community.**

The City of Alhambra encourages the development of housing units affordable for all segments of the population. This goal aims to maintain existing and future housing stock for low-income and special needs residents in the City. Programs to continue to advocate for low-income housing funding will be continued and expanded to meet the needs of disadvantaged populations. In addition, the City has established local laws and ordinances for affordable housing inclusion in future development projects and lowered the threshold for affordable housing development project approval among other low-income housing development incentives. Additional programs which function in synergy with Goal 1 is also included to prevent net housing loss by requiring replacement of housing units that are demolished.

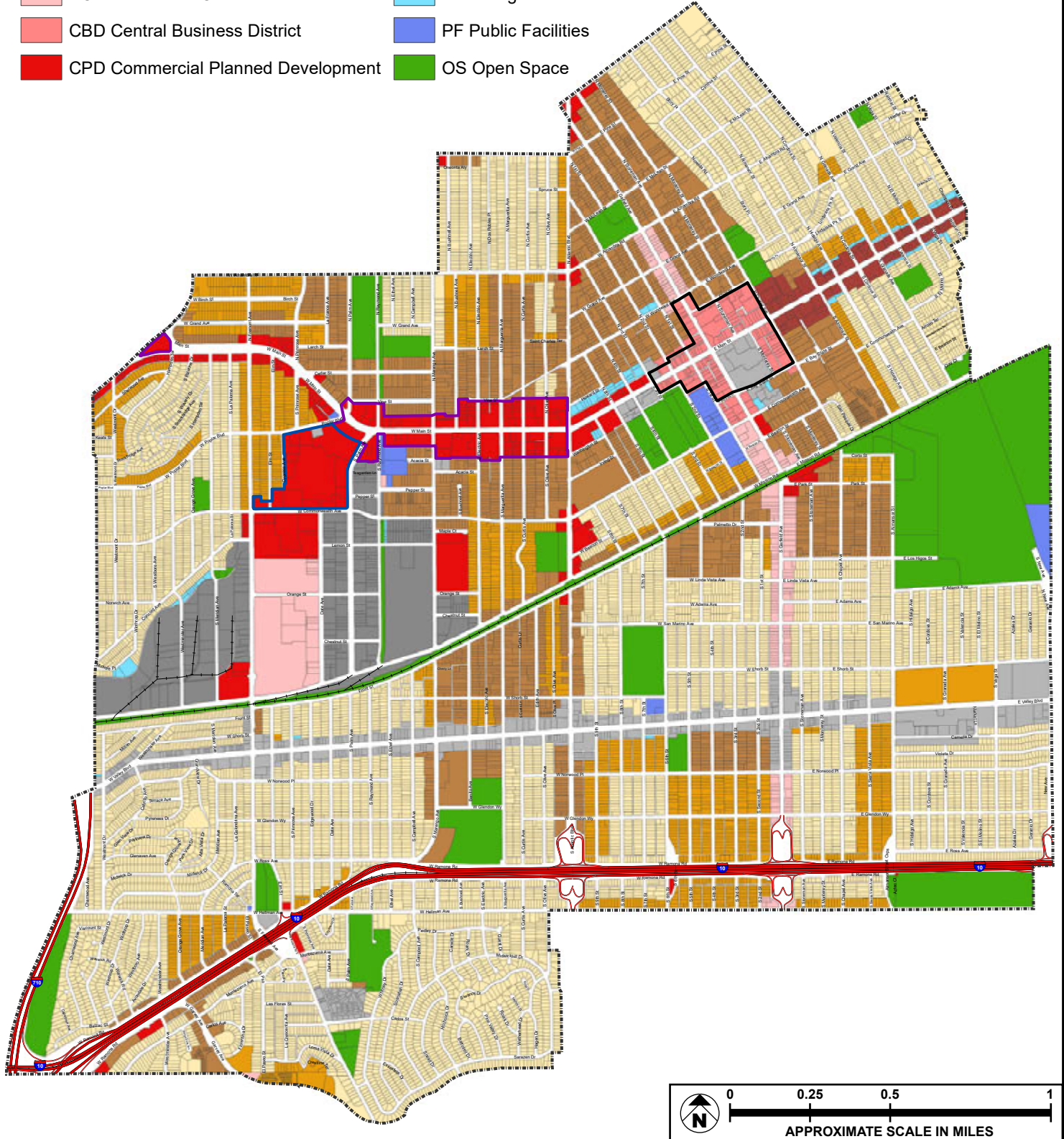


SOURCE: City of Alhambra - 2019

FIGURE 3

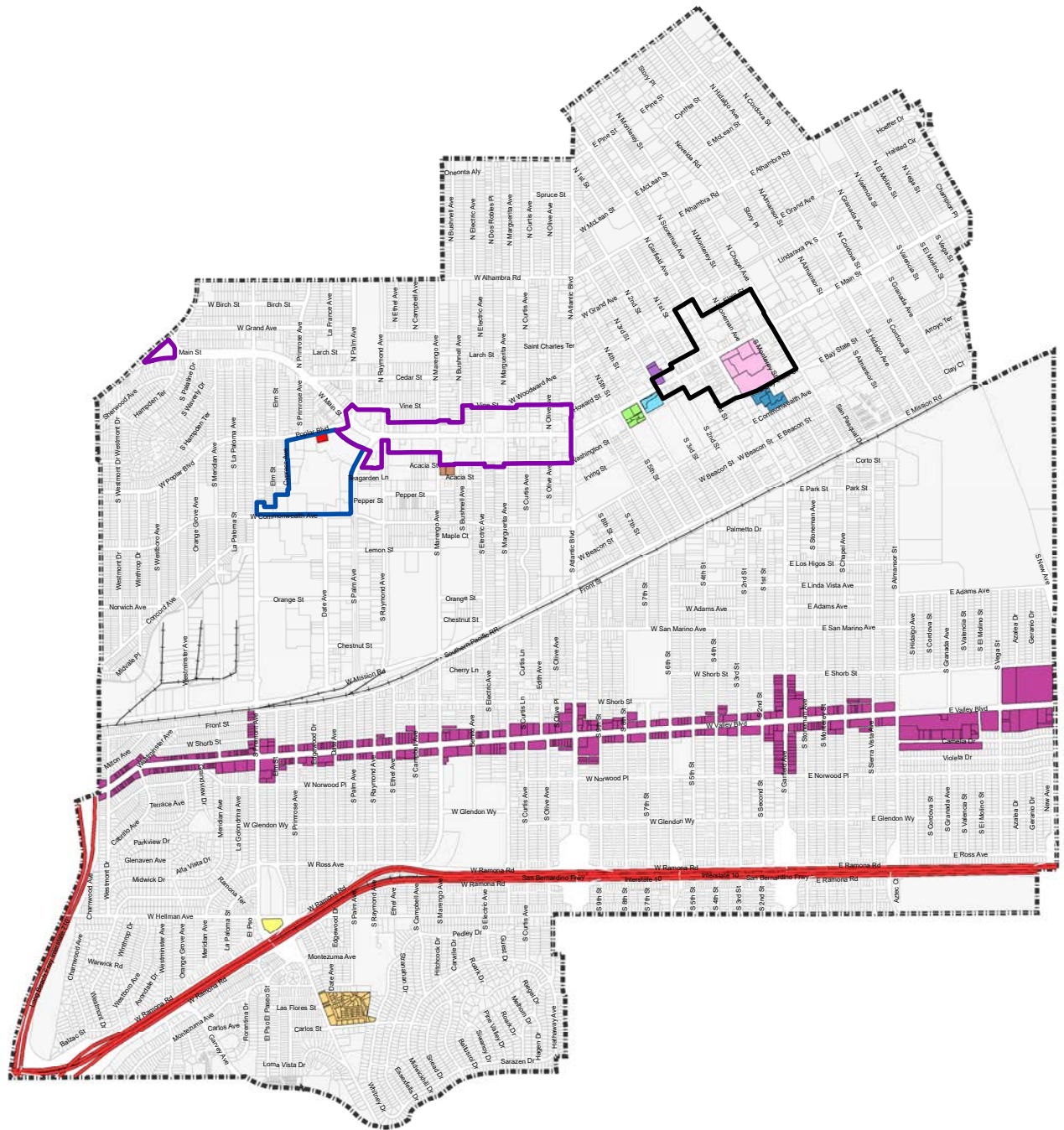
Zoning Designation

- R-1 Single-Family Residential
- R-2 Limited Multiple Family Residential
- R-3 Multiple Family Residential
- PO Professional Office
- CBD Central Business District
- CPD Commercial Planned Development
- EMC East Main Commercial
- SP Specific Plans
- IPD Industrial Planned Development
- P Parking
- PF Public Facilities
- OS Open Space
- Automotive Commercial Overlay
- Regional Commercial Overlay
- Downtown Revitalization District
- City Limits



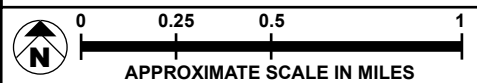
SOURCE: City of Alhambra - January 2020

FIGURE 4



Districts & Specific Plans

- | | | |
|---|--|--|
|  2300 Poplar |  Alhambra Place |  Automotive Commercial Overlay |
|  2400 South Fremont Avenue |  Alhambra Walk |  Regional Commercial Overlay |
|  2500 Hellman |  Casita De Zen |  Downtown Revitalization District |
|  Alhambra 5th and Main |  Marengo Acacia | |
|  Alhambra Pacific Plaza |  Valley Specific Plan | |



SOURCE: City of Alhambra - 2019

FIGURE 5

Goal 3: Identify adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the city's share of regional housing needs.

The City would identify adequate sites for all types of housing in order to meet the housing needs of all residents of the community. The city of Alhambra will update its Zoning Code to ensure that the sites identified in the RHNA have the appropriate zoning designations as suggested in the inventory. By capitalizing on the allowances of the current Zoning Ordinance and continuing to maintain an inventory of potential sites, the city will assure that adequate residentially-zoned and mixed-use sites are available.

Goal 4: Develop regulations and strategies that mitigate potential governmental and nongovernmental constraints to housing production and affordability.

The City will proceed to adopt the comprehensive zoning code, and to rezone and upzone certain areas within the City limit to allow for higher density residential development. Lot consolidation and assemblage to provide for larger parcels for higher density residential development would be facilitated by the City as needed. A residential redevelopment feasibility study will also be conducted to explore site specific redevelopment potential within the City to identify nonvacant sites for potential lower income and market rate housing unit development. Additionally, the City will also prioritize affordable housing production on City owned land to help reach the desired number of affordable housing production to meet RHNA requirements.

Goal 5: A community that provides equitable housing access to all neighborhoods and provides housing opportunities for all persons regardless of race, sex, marital status, religion, color, national origin, disability color, or family status.

Adoption of the Comprehensive Zoning Code Update will address identified constraints in the zoning code and development regulations. Continual review efforts to identify constraints will be conducted on a biannual basis. The review will also identify additional opportunities for streamlining of permitting processes to remove unnecessary barriers to development approval without compromising public health and community character. An education program on housing production will be launched to help residents understand the critical need for housing in their community.

Goal 6: A community that has a balance of employment and housing proximity to one another and offers opportunities for access to affordable housing near employment concentrations.

The City conducted a study on impediments to fair housing choice in April 2020. The study identified barriers to fair housing based on local and regional data and local community insights. Implementation of study recommendation will be conducted to ensure equitable access to opportunity for all persons in the community. Fair housing programs including fair housing services and landlord tenant counseling services will continue to be provided for City residents.

Goal 7: Ensure that the City's housing goals are met, and its housing policies are consistent with State law and the General Plan.

The City General Plan sections will be updated to be consistent with the 2021-2029 Housing Element update and State law. Annual performance reports on implementing the 2021-2029 Housing Element will be conducted to evaluate the progress of Housing Element implementation.

8. Public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- a. California Department of Housing and Community Development
 - i. Approval of the 2021-2029 Housing Element
- b. City
 - i. Certification of Initial Study
 - ii. Adoption of 2021-2029 Housing Element

9. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1? No.

If so, has consultation begun? The 90-day tribal notification period took place from May 26st, 2021 to August 24th, 2021, with all certified mail taking place between May 18th, 2021 and May 26th, 2021. No tribes requested for consultation.

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 and Forestry	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<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/Employment/Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation and Circulation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

<input checked="" type="checkbox"/>	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
<input type="checkbox"/>	I find that although the proposed Project could have a significant effect on the environment, there would 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 would be prepared.
<input type="checkbox"/>	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature

Date

2.0 POTENTIAL ENVIRONMENTAL IMPACTS

2.1 Aesthetics

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Except as provided in PRC 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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	<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"/>

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

Less than Significant Impact. A scenic vista means a picturesque, pastoral scene of rural land, or open space with little or no modern intrusions. The City is a built-out community with land area totaling 4,899 acres. At 7.6 square miles, it is the second-largest City in the San Gabriel Valley in terms of land area.¹⁰ Due to the topography of the City, which consists of a central, relatively flat valley framed by hillsides on the south and west, and washes on the east, there are many long-range mountain views throughout the City.¹¹ The nearest existing scenic vistas to the Project site are the background views of the distant San Gabriel Mountains to the north. The Project site and surrounding area are characterized by dense urban development.

Adoption of the 2021-2029 Housing Element would not result in the approval of physical housing developments; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Given the City’s surrounding hillside and mountain views, new development allowed under the Housing Element has the potential to affect views from the City of scenic vistas. Specifically, new, and more intensely developed urban uses along Valley Boulevard, Main Street, Fremont Avenue, and Garfield Avenue could partially obstruct views of scenic vistas from various locations in the City.

Because development of new urban residential uses would be regulated by policies in the Alhambra General Plan and because views of scenic vistas would only change incrementally due to the surrounding

10 City of Alhambra. General Plan. “Land Use and Community Development.” <https://www.Cityofalhambra.org/resources/general-plan-update>. Accessed June 2021.

11 City of Alhambra, Alhambra General Plan EIR, January 2019

urban environment, impacts to scenic vistas would be less than significant. In addition, future developments in the City would undergo further environmental and design review on a project-by-project basis, as they are proposed, to identify and address any project-specific impacts to scenic vistas.

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

No Impact. There are no State-designated scenic highways within the boundary of the City. The Project site also does not contain trees or rock outcroppings with scenic significance. Therefore, the proposed Project would not substantially damage scenic resources within a State scenic highway.

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

Less Than Significant Impact. While the Housing Element encourages the development of a range of housing types and affordability levels, it does not include any specific designs or proposals for development that would degrade the existing visual character of the City. Adoption of the Housing Element would result in certain General Plan amendments and rezoning of areas within the City limits to accommodate for the construction of additional housing units. However, the General Plan amendments and rezoning efforts would mirror the goals and policies of the General Plan Elements and the 2021-2029 Housing Element and rezoning occurring in the City would be compatible with other adjacent uses within the City limits. Future residential development projects would be required to comply with General Plan policies related to aesthetic resources and Development Code requirements associated with site planning and development regulations. Moreover, future development would require compliance with the City's zoning regulations. Thus, adoption and implementation of the proposed Project would result in less than significant impacts associated with the degradation of the visual character of the City.

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. The proposed Housing Element is a policy-level document that does not include any specific development designs or proposals that would increase daytime glare or nighttime illumination in the City. Future residential development are anticipated to be located near and within existing developed areas. As such, light and glare from new residential developments will be comparable to existing developed neighborhoods in an urban setting. Future development in the City would be required to be designed and constructed in accordance with the Alhambra Municipal Code (AMC). Light and glare impacts of subsequent development projects would be considered as part of the building permit process independent of California Environmental Quality Act (CEQA) and therefore unaffected by the adoption of the 2021-2029 Housing Element update. As previously discussed, Alhambra is a built-out City and the development of housing units within the City would produce lighting and glare similar to those existing within the City limits when in compliance with existing municipal codes and zoning requirements. As the proposed Project does not change existing policy regarding light and glare, and as compliance with existing code is determined at the time of building permit issuance and inspection, the proposed Project would result in a less than significant impact associated with increased light and glare.

2.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
<p>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. Would the Project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<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, forestland (as defined in PRC section 12220(g)), timberland (as defined by PRC 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 forestland or conversion of forestland to nonforest 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 nonagricultural use, or conversion of forestland to nonforest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. The Project site is developed and does not include land identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to Farmland Mapping and Monitoring Programs of the California Department of Conservation (2018).¹² The Project would not result in the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. Therefore, no impact would occur and no mitigation is required.

12 California Department of Conservation, (2018). Farmland Mapping and Monitoring Program. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed in June 2021.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. According to the City Zoning Designation, the City does not contain any land zoned for agricultural use.¹³ The Project would not affect any properties that are zoned for agricultural use or currently under a Williamson Act contract, per the California Department of Conservation (2016). No impacts would occur, and no mitigation is required.

c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The City is located in an urban setting and does not contain any areas zoned for forestland or timberland.¹⁴ The Project would not cause rezoning of forest land, timberland, or zoned Timberland Production. Therefore, no significant impacts would occur.

d. Result in the loss of forestland or conversion of forestland to nonforest use?

No Impact. As mentioned above, the area within the City limits is fully urbanized with no existing forest land. The City does not contain land areas which is managed as timberland or managed to produce forest products. There would be no loss of forestland or conversion of forestland; therefore, no impact would occur.

e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to nonforest use?

No Impact. There are currently no agricultural operations being conducted on or surrounding the proposed Project area. No areas within or surrounding the City limits are zoned for agricultural uses. In addition, no forestland is located within the City limits or in the vicinity of the City limits. Thus, no farmland or forestland would be converted to other uses under the proposed Project, and no impact would occur.

13 City of Alhambra. City of Alhambra Zoning Designation January 2020. Accessed June 2021. <https://www.Cityofalhambra.org/resources/alhambra-zoning-map>.

14 City of Alhambra. City of Alhambra Zoning Designation January 2020. Accessed June 2021. <https://www.Cityofalhambra.org/resources/alhambra-zoning-map>.

2.3 Air Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 nonattainment 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"/>
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"/>

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

Less than Significant Impact. The South Coast Air Quality Management District (SCAQMD) adopted an updated air quality management plan (AQMP) in March 2017.¹⁵ The Final 2016 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments; accommodate growth; reduce pollutants in the Basin; meet federal and State air quality standards; and minimize the fiscal impact of pollution control measures on the local economy. It builds on approaches in the previous AQMP to achieve attainment of the federal ozone air quality standard. These planning efforts have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD’s recommended daily emissions thresholds.

SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG’s 2016-2040 RTP/SCS regarding population, housing, and growth trends. With regard to air quality planning, SCAG has prepared and adopted the 2020-2045 RTP/SCS,¹⁶ which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. Determining whether

15 South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.
 16 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, “Chapter 1,” <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, Accessed August 2021.

or not a project exceeds SCAG's growth forecasts involves the evaluation of the following: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

As discussed in *Section 2.11- Land Use and Planning*, the 2021-2029 Housing Element would require updates to land use plans including updates to the General Plan Land Use Element and the existing zoning map. However, any changes and updates to the General Plan elements and zoning map would be consistent with existing Land Use goals outlined in the General Plan. Any and all changes to existing land use plan, policy, or regulation adopted would be for the purpose of ensuring consistency throughout the General Plan document. The General Plan includes land use planning objectives to improve regional air quality that minimizes vehicle emissions and exposures to the associated air pollutants.¹⁷ The City is highly urbanized with accessible public transit services including the Alhambra Community Transit, the Montebello Bus line, Metro buses, the Metrolink, and the Metro Gold Line. As such, accessible mass transit services and opportunities for walking and biking would be available to residents and visitors, thus reducing vehicle trips and vehicles miles traveled.

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These growth forecasts are based on local plans and policies applicable to the specific area. As discussed in *Section 2.14- Population, Employment, and Housing*, the 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs to encourage housing development. The adoption of the 2021-2029 Housing Element would not result in physical alterations or approval of housing development projects. However, the adopted program would encourage local housing development with a goal to achieve the development of approximately 6,825 new housing units by the year 2029, as required by the 6th Cycle RHNA assigned by SCAG and HCD. As such, the 2021-2029 Housing Element is consistent with the growth assumptions in the regional air plan. Impacts would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard?

Less than Significant Impact. In regard to determining the significance of a project's contribution to cumulative air quality impacts, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple related projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not

¹⁷ City of Alhambra, Final General Plan, August 2019.

considered to be cumulatively significant.”¹⁸ Therefore, if a project generates less than significant construction or operational emissions, then the Project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

The 2021-2029 Housing Element would not conflict with or obstruct implementation of the State Implementation Plan and the AQMP because it would not approve any development projects, however it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because adoption of the Housing Element would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or state ambient air quality standard as no development is proposed. For any specific future residential projects, SCAQMD consistency and other issues related to potential long-and short-term impacts to air quality would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. As such, adoption of the 2021-2029 Housing Element would result in a less than significant impact relative to regional air quality.

Mitigation Measures: No Mitigation Measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Individuals who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. Some individuals are considered more sensitive to air pollutants than others because of preexisting health problems, proximity to the emission sources, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land uses are moderately sensitive to air pollution because the vigorous exercise associated with recreation facilities put a high demand on respiratory system function.

As discussed previously, adoption of the 2021-2029 Housing Element would not approve any physical alterations or development projects; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because it would not facilitate any new sensitive receptors within 500 feet of the I-10 or I-710 freeways, consistent with the

¹⁸ South Coast Air Quality Management District (SCAQMD), White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003), Appendix A.

buffer recommendations included in the CARB's Air Quality and Land Use Handbook.¹⁹ As such, no pollutants would be emitted and no sensitive receptors would be impacted and impacts would be less than significant. Specific future residential projects in the City would be subjected to environmental review and the City's entitlement process to assess impacts on localized air quality emissions and impacts to sensitive receptors. For any specific future residential projects, SCAQMD consistency and other issues related to potential long-and short-term impacts to air quality would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. As such, the 2021-2029 Housing Element would result in a less than significant impact relative to localized air quality.

Mitigation Measures: No Mitigation Measures are required.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. According to the SCAQMD, "while almost any source may emit objectionable odors, some land uses would be more likely to produce odors...because of their operation."²⁰ Land uses that are more likely to produce objectionable odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

Construction

Construction of future developments, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent residences, they are temporary and intermittent in nature. As construction-related emissions dissipate, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. As such, construction impacts would be less than significant.

Operation

Operation of the future residential developments would not contain any active manufacturing activities. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. Therefore, operational impacts would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

19 California Air Resources Board (CARB), Air Quality and Land Use Handbook, April 2005, <https://www.arb.ca.gov/ch/handbook.pdf>.

20 South Coast Air Quality Management District (SCAQMD), Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, 2-2.

2.4 Biological Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US 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 US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

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 US Fish and Wildlife Service?

Less than Significant Impact. The 2021-2029 Housing Element update is a policy document consisting of housing programs. While implementation of the 2021-2029 Housing Element update would ultimately require rezoning to accommodate the RHNA, rezoning would not be approved as part of the Project. Therefore, the adoption of the 2021-2029 Housing Element update would also not approve any physical alterations to the land and would not result in physical environmental impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because of the reasons discussed below.

The City General Plan: Resources Element (2019) states that while wildlife inhabits urban areas, no rare or endangered plant or animal species permanently reside within the city limits. Occasionally, migratory birds may stop in Alhambra’s parks and green spaces, including the Alhambra Golf Course. Compliance with the Migratory Bird Treaty Act would reduce impacts to migratory birds to a less than significant level. Therefore, future housing development projects is not anticipated to eliminate any native wildlife

habitat or sensitive plant communities and would not affect any important habitat linkages that could support sensitive species, the Project would not result in a substantial adverse effect on any candidate, sensitive, or special-status species.

Adoption of the 2021-2029 Housing Element would not approve any developments. Future housing development projects would be required to comply with CEQA and conduct necessary biological studies as part of its entitlement process. Mitigation measures would be adopted as necessary, in conformance with CEQA. Therefore, there would be a less than significant impact to candidate, sensitive, or special status species.

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 US Fish and Wildlife Service?

No Impact. The Housing Element Update does not approve specific development designs or proposals; however, it commits the City to redesignate and rezone certain areas for future housing. The Project does not propose policies or programs that would conflict with the existing policies regarding the protection of biological resources in the General Plan. The General Plan: Resources Element (2019) does not identify any sensitive or natural communities on or within the City limits. There are no rivers or streams and no riparian habitat, or any other kind of sensitive natural community identified in local or regional plans such as the SCAG Natural Community Conservation Plan (NCCP).²¹ The City is characterized by urban and built up land with designated open space. Although the Housing Element could lead to new residential development, there would not be a substantial adverse effect on any riparian habitat because future development projects would be required to analyze environmental impacts and comply with the environmental reporting requirements pursuant to CEQA, on a case-by-case basis. For these reasons, adoption of the 2021-2029 Housing Element would have no substantial adverse effect on any riparian habitat or sensitive natural community.

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?

No Impact. Wetlands are defined by Section 404 of the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. There is no wetland habitat on or in the immediate vicinity of areas within the City designated for future housing. The nearest wetland habitats that run through the City are the Alhambra Wash and two freshwater ponds at the Alhambra Golf Course.²² These areas would likely not be redesignated and rezoned for future housing development; nonetheless, future housing development proposed by the 2021-2029 Housing Element would be required to conduct biological

21 Southern California Association of Governments (SCAG). Natural Community Conservation Plan (NCCP). Accessed June 2021. Southern California Association of Governments: Natural Community Conservation Plan (NCCP): Natural Community Conservation Plan (NCCP) (arcgis.com)

22 US Fish and Wildlife Service, National Wetland Inventory, <https://www.fws.gov/wetlands/data/mapper.html>. Accessed November 2021.

assessments in conformance with CEQA. As the proposed Housing Element update is a policy-level document and would not approve any development projects, the Housing Element adoption impacts would be less than significant.

- 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. The areas within and surrounding the City limits is fully urbanized, dominated by buildings and other structures, pavement, and ornamental vegetation such as turf grass, trees, and shrubs. There are no forms of natural wildlife habitat, no rivers, lakes or streams, and no native wildlife nursery sites within the City limits. The highly disturbed local landscape does not provide suitable habitat to support native resident or migratory fish or wildlife movement. Future land developments would be required to conduct biological assessments in accordance with CEQA requirements. Potential impacts to various biological resources of any specific future residential projects would be assessed at the time of development project proposal. Therefore, 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 Project site is completely developed, and vegetation on-site is limited to trees and landscaped areas between buildings, along walkways, and around the perimeter of parking areas. Any future development projects requiring tree removal would be required to comply with local ordinances protecting biological resources including the City's Tree Preservation Ordinance, codified in Section 23.87 of the AMC. As previously mentioned, the Project would not approve or propose any physical developments. The 2021-2029 Housing Element update does not propose policies or programs that would conflict with the existing policies regarding the protection of biological resources in the General Plan or existing ordinances. The Project site includes the entire City. Future housing development would be required to be consistent with federal, State, and local policies regarding biological resources. 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. The Project site includes the entire City limit which is not located in or adjacent to an existing County Significant Ecological Area.²³ Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan that applies to the City. As such, future housing development would not conflict with any habitat conservation plans. Therefore, no impact would occur.

23 County of Los Angeles, Department of Regional Planning, Significant Ecological Areas and Coastal

2.5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 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 Section 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 formal cemeteries	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Less than Significant Impact. The 2021-2029 Housing Element update is a policy document, consisting of a housing program. While implementation of the 2021-2029 Housing Element update would ultimately require rezoning to encourage housing development and meet RHNA requirements, rezoning would not be conducted as part of the current action. Therefore, the adoption of the 2021-2029 Housing Element update would not result in physical developments or zoning changes. However, implementation of the programs contained in the document would incentivize housing development. Depending on the location, future development in the City has the potential to cause changes to historical resources. The General Plan contains policies for the protection of historic and cultural resources, including policies R-6E and R-6F, and all new development would be required to be consistent with these policies.

Although the City has never developed an official inventory of historic resources in the City, various private citizens and groups have performed surveys of portions of the City in the past. Some of these surveys have identified potential historic resources, but no buildings in the City have been included in the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) and, to date, the City has not adopted any specific criteria for consideration at the local level.²⁴ The 2021-2029 Housing Element update would not change or alter policies to protect cultural resources. The potential impacts to historical resources of any specific future residential projects would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Based on the above, the 2021-2029 Housing Element update would result in less than significant impacts to historical resources.

24 City of Alhambra. General Plan: “Resources.” <https://www.Cityofalhambra.org/resources/general-plan-update>. Accessed July 2021.

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

Less than Significant Impact. As mentioned previously, the General Plan contains policies for the protection of historic and cultural resources (i.e., archaeological and paleontological), including policies R-6E and R-6F, and all new developments would be required to be consistent with existing federal, State, and local policies. The project also assesses for tribal cultural resource impacts which are discussed in 2.18 Tribal Cultural Resources.

The 2021-2029 Housing Element update would not change or alter policies to protect cultural resources. The potential impacts to cultural resources of any future develop projects would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Based on the above, the 2021-2029 Housing Element update would result in less than significant impacts to cultural resources.

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

Less than Significant Impact. As mentioned previously, adoption of the 2021-2029 Housing Element update would not approve land developments of any kind. Therefore, no human remains would be disturbed from the adoption of the 2021-2029 Housing Element update. Although the City is built out and no development would occur in previously-undisturbed areas, the potential to encounter previously-undiscovered human remains cannot be entirely ruled out during construction of future housing sites. Excavation activities facilitated by future construction may therefore have the potential to disturb human remains. Future developments would be required to follow State Health and Safety Code Section 7050.5 which requires that no further disturbance shall occur in the event any human remains is encountered during construction until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Further, future development would be required to conduct assessments pertaining to the existence of human remains in conformance with CEQA requirements. Additionally, AB 52 consultation with local tribes would also be required for future development projects which would further minimize potential impacts to human remains. The potential impacts related to human remains for any future development projects would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Based on the above, the 2021-2029 Housing Element update would result in less than significant impacts to human remains, including those interred outside of formal cemeteries.

2.6. Energy

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<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"/>

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

Less than Significant Impact. The City is within the Southern California Edison (SCE) service area. The SCE service area covers 50,000 square miles and includes 15 counties, which serve approximately 15 million people in central, coastal, and Southern California.²⁵ SCE generates electricity from a variety of sources including hydropower, coal, nuclear sources, and renewable sources.

Natural gas service to the City is provided by the Southern California Gas Company (SoCalGas). The SoCalGas service area reaches 21.8 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.²⁶

According to the California Energy Commission (CEC), transportation accounts for nearly 40% of California’s total energy consumption. In 2018, the most recent year of publicly available data, California consumed approximately 681,272,000 barrels (28,613,424,000 gallons, or 42 gallons per barrel) of petroleum for transportation.²⁷ Incentive programs, such as the CEC’s Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the State to reduce its dependency on gasoline. Several regulations adopted by California to reduce greenhouse gas (GHG) emissions, such as SB 375, have the added benefit of reducing the State’s demand on petroleum-based fuels by requiring reductions in vehicle miles traveled (VMT) and by reducing the carbon intensity of transportation fuels. The CEC predicts that the demand for gasoline would continue to decline over the upcoming years, and there would be an increase in the use of alternative fuels.²⁸

25 Southern California Edison, “Southern California Edison’s Service Area,” <https://www.sce.com/about-us/who-we-are/leadership/our-service-territory>. Accessed August 2021.

26 SCG, “Company Profile,” <https://www.socalgas.com/about-us/company-profile>. Accessed August 2021.

27 US Energy Information Administration, Independent Statistics & Analysis, Table F16: Total Petroleum Consumption Estimates, 2019, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US. Accessed August 2021.

28 CEC, Final 2019 Integrated Energy Policy Report, <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>. Accessed August 2021.

New residential uses would be required to comply with Title 24, Part 6 of the California Code of Regulations (CCR), also known as Building Energy Efficiency Standards, which regulates the design of building shells and building components. The Title 24 standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2019 Building Energy Efficiency Standards (2019 Building Standards), effective January 1, 2020.²⁹

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CALGreen, establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CALGreen is periodically amended. Chapter 24.04.020 of the AMC encourages and promotes developments to install solar energy devices, such as solar panels to generate electricity.³⁰ Future residential developments would have the opportunity to conserve energy using solar panels and would be consistent with the Alhambra's commitment to the 2013 Energy Efficient Climate Action Plan to pursue energy efficient appliances and devices. Compliance with these State and local codes and commitments to voluntary measures such as the commitment for future residential units to meet energy efficiency standard comparable to Leadership in Energy and Environmental Design (LEED) Silver, and measures identified in the approved Water Supply Assessment including the use of high efficiency toilets and showerheads, Energy Star washers, water-saving pool features, and drought tolerant landscaping would ensure the efficient use of energy resources during construction and operation.

Construction

During construction, energy is directly consumed on a limited basis to power lights, and electronic equipment, and indirectly for the conveyance of water used for dust control during grading. As discussed previously, adoption of the 2021-2029 Housing Element would not approve any development projects and therefore, would not result in any construction energy consumption impacts; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because all future residential developments would be required to conduct construction energy use analysis in conformance with CEQA and are required to comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel-fueled, commercial vehicles be limited to five minutes at any location. As a result, the 2021-2029 Housing Element would not result in inefficient, or unnecessary consumption of transportation resources during construction of future housing. Impacts would be less than significant.

Operation

As mentioned above, adoption of the 2021-2029 Housing Element would not approve any development projects and therefore, would not result in any operational energy consumption impacts; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have

29 CEC, 2019 Building Energy Efficiency Standards, <https://www.energy.ca.gov/title24/2019standards/>. Accessed August 2021.

30 City of Alhambra, Alhambra Municipal Code, "Chapter 24: Solar Energy."

indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because all new residential developments would be required to conduct operational energy use analysis in conformance with CEQA. The operation of new residential uses would consume energy for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during the operations of new residential uses in the form of water usage, solid waste disposal, and vehicle trips, among others. New residential uses would be required to comply with Title 24 of the California Building Energy Efficiency Standards and adhere to State regulations. Therefore, impacts to operational energy use would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

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

Less than Significant Impact. As discussed previously, the 2021-2029 Housing Element is a housing policy document which encourages the development of housing projects and would not approve any individual development projects. The 2021-2029 Housing Element also would not suggest any changes or policies which would conflict with or obstruct a State or local plan for renewable energy or energy efficiency. All new developments would be required to comply with Title 24 of the California Building Energy Efficiency Standards to ensure future developments meet State and local plan on energy standards. Moreover, Chapter 24.04.020 of the AMC encourages and promotes the installation and use of solar energy devices to generate electricity, heat or cool building structures, provide process heat or mechanical energy, or provide hot water for domestic purposes. As such, future developments would meet renewable energy and energy efficient standards, including Title 24 of the California Building Energy Efficiency Standards.

Additionally, new residential uses would be assessed for its consistency with regional planning strategies that address energy conservation in conformity with CEQA. SCAG's 2020-2045 RTP/SCS focuses on creating viable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most crucial to the future of the region. The 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. Future residential uses would be served by existing community and public transit including the Alhambra Community Transit, the Montebello Bus line, Metro buses, the Metrolink, and the Metro Gold Line.

Vehicles used during construction activities would be required to comply with California Air Resources Board (CARB) anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations which indirect reduces the consumption of petroleum based fuels. During the operational lifetime of a project, newer vehicles sold on the market would be required to comply with Corporate Average Fuel Economy (CAFE) fuel economy standards expected to incrementally take effect. Accordingly, fuel consumption is anticipated to decrease each year through implementation of regulation that require higher energy efficiencies and higher efficient and alternative fueled vehicles. Therefore, adoption of the 2021-2029 Housing Element would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

2.7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<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"/>
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 (1994), 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"/>

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The State Mining and Geology Board defines an active fault as one that has had surface displacement within the Holocene Epoch (roughly the last 11,000 years) and defines a

potentially active fault as any fault that has been active during the Quaternary Period (approximately the last 1,600,000 years). These definitions are used in delineating Earthquake Fault Zones as mandated by the Alquist-Priolo Geologic Hazard Zones Act of 1972 and as subsequently revised in 1994 as the Alquist-Priolo Geologic Hazard Zoning Act and Earthquake Fault Zones Act.

The City lies on the western edge of the San Gabriel Valley, which is an alluvial plain created by the weathering of the San Gabriel Mountains.³¹ No active faults are known or suspected to traverse Alhambra and the City is not included in a special seismic zone established by the Alquist-Priolo Special Studies Zones Act of 1972.³² The Montebello fault does cross into and end in the City but is not considered an active fault in Alhambra. Therefore, surface rupture in the City is unlikely. Nevertheless, seismic activity from nearby faults, including those that form the Sierra Madre fault zone, the Whittier, East Montebello, Raymond Hill, and San Rafael faults, could cause damage to structures from ground shaking in the event of a major earthquake. Several major faults in the southern California region, including the San Andreas fault approximately 25 miles north of the City and the Newport-Inglewood fault to the southeast, would have the potential to cause substantial damage in the event of a major earthquake.

As previously mentioned, the adoption of the 2021-2029 Housing Element would not approve any development projects, however it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Nothing can ensure that future housing developments do not fail under seismic stress, but proper engineering, including compliance with the Los Angeles County Building Code, with City of Alhambra amendments, the City of Alhambra Municipal Code, geotechnical recommendations conducted on per-project bases, and the policies described in the Health and Safety chapter of the City's General Plan would minimize the risk to life and property, resulting in a less than significant impact from groundshaking caused by fault rupture. Adoption of the 2021-2029 Housing Element update would have a less than significant impact.

ii. Strong seismic ground shaking?

Less than Significant Impact. Although the City does not contain areas within an Alquist-Priolo Zone, the southern California region in general is seismically active. As such, the City is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Project site is moderate to strong ground shaking on one of the local regional faults. As the Project site is located in a seismically active region, all future construction projects would be required to conform to all applicable provisions of the Alhambra Building Code (ABC) and California Building Code (CBC) with respect to new construction. A geotechnical report would also be required prior to approval of proposed development projects. The adoption of the 2021-2029 Housing Element would not approve any development projects. Therefore, the adoption of the 2021-2029 Housing Element update would not exacerbate the risk of built structures

31 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

32 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

and human safety related to strong seismic ground shaking. As such, impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to fluid when subjected to high-intensity ground shaking. Liquefaction occurs when there is the presence of shallow groundwater, low-density fine, clean, sandy soils, and high-intensity ground motion. Effects of liquefaction can include sand boils, settlement, and load-bearing capacity failures below foundations.

According to the City's General Plan, Alhambra is not located in an area with high liquefaction potential.³³ Additionally, the Project does not approve any physical alteration of land or development. Future housing development in the City would have a less than significant impact on liquefaction because housing would be subject to compliance with applicable building codes and there are no liquefaction zones near the City of Alhambra.³⁴ As such, the impact of the Project on liquefaction is less than significant.

iv. Landslides?

Less than Significant Impact. Most of Alhambra is flat and not subject to landslides.³⁵ However, some small hillside areas in the western and southwestern portions of the City are potentially subject to landslides. Because of the City's relatively level topography, the potential for seismic-induced landsliding in the City is limited. *Figure 6-Landslide Potential Map* shows the small area in the western portion of the City that is identified as being in a landslide hazard zone.³⁶ However, impacts would be less than significant because future developments would be required to conduct geotechnical investigations to determine risks in regard to landslide potential during the City entitlement process. Thus, given the adoption of the 2021-2029 Housing Element update does not approve any physical alteration of the environment and the relatively low potential of landslides in Alhambra, the impact of the Project is less than significant.

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

Less than Significant Impact. According to the City's General Plan, the City Public Works Department, in conjunction with the Los Angeles County Flood Control District, the California Department of Water Resources, and the U.S. Army Corps of Engineers, maintains programs designed to monitor soil erosion in

33 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

34 City of Alhambra, Alhambra General Plan EIR, January 2019

35 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

36 City of Alhambra. General Plan: "Health and Safety." Figure 22: Landslide Potential. Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

areas of the City experiencing problems of this type.³⁷ The City also has a grading ordinance to control erosion resulting from man-made soil disturbances under Section 6.62.030 of the Code of Ordinances which prohibits public nuisance conditions of which maintenance of adverse topography is listed. The absence of significant slopes and the developed nature of the City reduces the potential for erosion within the city limits. Due to the urbanized nature of the City and the fairly level topography, soil erosion generally is not an issue in Alhambra.³⁸ As a result, no significant soil erosion or subsidence problems are evident in Alhambra. The Project would not approve of any physical alteration of land and would have a less than significant impact on soil erosion.

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?

Less than Significant Impact. The adoption of the 2021-2029 Housing Element would not approve any development projects and would not result in structures located on a geologic unit or soil that is unstable. Moreover, the absence of significant slopes and the developed nature of the City help to mitigate erosion. As a result, no significant soil erosion or subsidence impacts are evident in Alhambra.³⁹ The Project would have a less than significant impact on landslide, lateral spreading, subsidence, liquefaction, or collapse with no proposed developments.

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. Collapsible soils are those unsaturated soils that can withstand relatively high pressure without showing significant change in volume, but upon wetting become susceptible to a large and sudden reduction in volume. Expansive soils are fine-grained and have variable amounts of clay that can undergo volumetric shifts as a result of changes in moisture content. The upward pressures induced by the swelling can have harmful effects upon structures and other surface improvements. Soils in the San Gabriel Valley consist of alluvial debris deposited from the weathering of the San Gabriel Mountains and generally consist of sand, gravel, and clay deposited in successive layers by runoff from the nearby mountains and hills. The major soil types in the City include gravelly loams, sandy loams, and clays. These soil types do not have a high potential for collapse or expansion.⁴⁰ Though the adoption of the 2021-2029 Housing Element would not approve any development projects, it commits the City to

37 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

38 City of Alhambra. General Plan: "Resources." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

39 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

40 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

redesignate and rezone certain areas for future housing development. Although the Housing Element could lead to new residential development, impacts would be less than significant because future residential structures would be required to comply with the CBC, which includes requirements to address soil-related hazards. As such, adoption of the Housing Element would not result in structures located on expansive soil that would create substantial direct or indirect risks to life or property. Therefore, impacts would be less than significant.

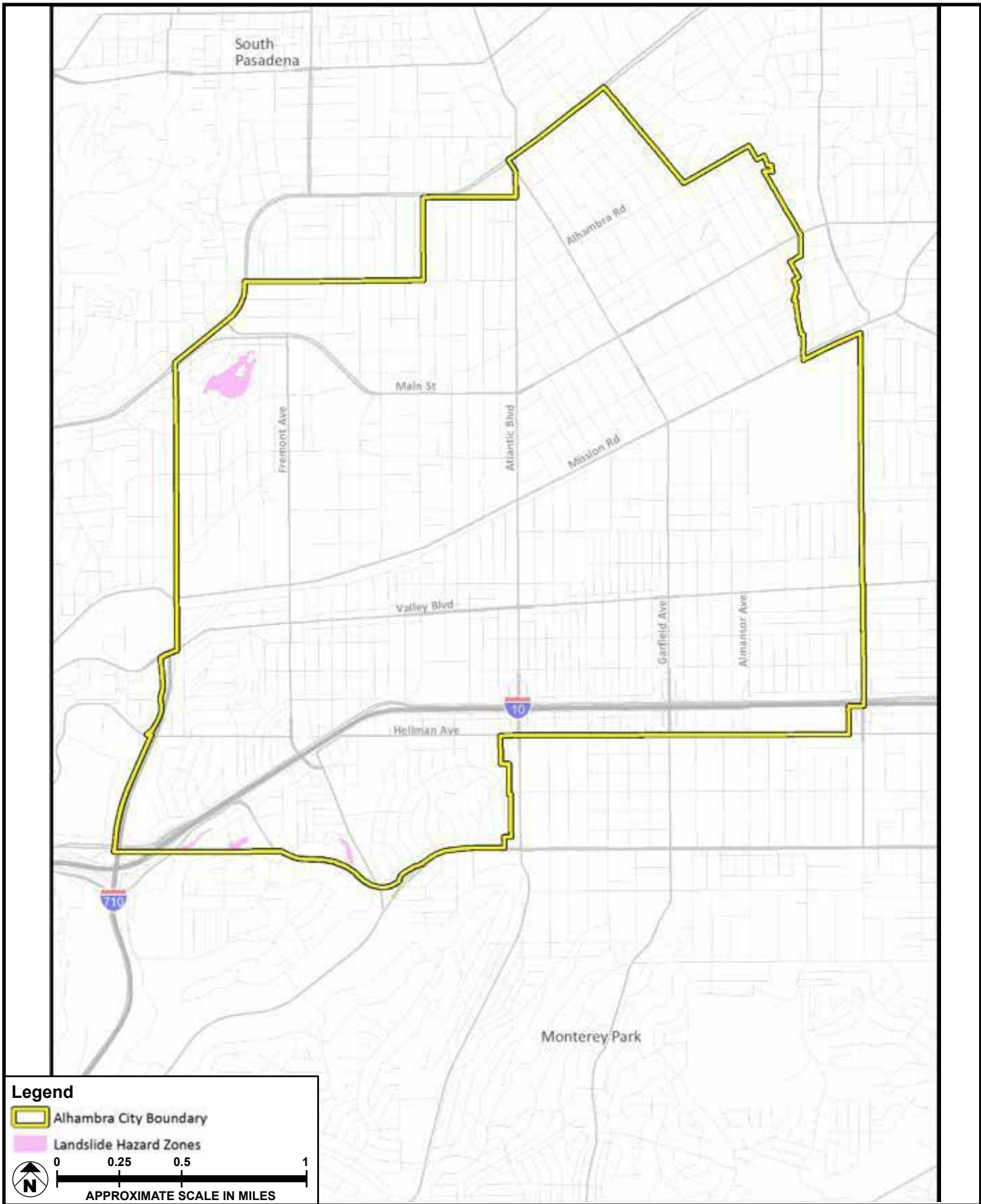
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project site is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems would be necessary within the City limits.

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

Less than Significant Impact. The City's General Plan does not identify paleontological resources within the City limits; however, sub-surface paleontological resources have been found throughout Southern California, and therefore, such resources may exist within the City. As previously mentioned, the City is built out with only 5.5 acres of combined vacant land spread throughout the City. The City is composed largely of developed, previously developed, and highly disturbed areas.

The adoption of the 2021-2029 Housing Element would not approve any development projects. Though the adoption of the Housing Element would not approve any development projects, it commits the City to redesignate and rezone certain areas for future housing development. Although the Housing Element could lead to new residential development, impacts would be less than significant because future housing development projects are required to conduct paleontological assessments in accordance with the requirements of CEQA and implement mitigation measures such as monitoring of earthwork as appropriate to offset any potential impacts to paleontological resources. As such, impacts to paleontological resources is considered low and would be less than significant.



SOURCE: Basemap ESRI - 2018; Department of Conservation - 2016

FIGURE 6

2.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<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 emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. Construction activity impacts are relatively short in duration, and they contribute a relatively small portion of the total lifetime GHG emissions of a project. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, no basis exists for concluding that a very small and essentially temporary (primarily from construction) increase in emissions could cause a measurable increase in global GHG emissions necessary to force global climate change.

Operation of new residential uses have the potential to generate greenhouse gas emissions through vehicle trips. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development. Operational emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are discussed in more detail below.

Area Sources

Area source GHG emissions result primarily from natural gas fireplaces with additional emissions from landscaping-related fuel combustion sources, such as lawnmowers. Consumer products are various solvents used in nonindustrial applications which emit Reactive Organic Gases (ROGs) during their product use. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries.

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

Mobile Sources

Vehicle trips generated by growth within the City would result in operational emissions through the combustion of fossil fuels. The 2021-2029 Housing Element is a policy document and the adoption of it would not generate VMT. The City includes various goals and policies in its General Plan to reduce GHG emissions using alternative transportation and increasing the accessibility of public transit. Accessible public transit would reduce VMT as it encourages commuters and residents to ride buses and commuter rails as opposed to driving their private vehicles that contribute to fuel gas emissions. The City is highly urbanized with accessible public transit services including the Alhambra Community Transit, the Montebello Bus line, Metro buses, the Metrolink, and the Metro Gold Line.

Solid Waste Emissions

Disposal of organic waste in landfills can lead to the generation of CH₄, a potent GHG. Residential developments typically contribute to the emission of fugitive CH₄ from landfills, as well as CO₂ and NO₂ from the operation of trash collection vehicles.

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. New residential developments would result in indirect GHG emissions due to water consumption and wastewater generation. Per CALGreen standards, new residential uses are required to include high efficiency water fixtures.

Conclusion

As discussed previously, the 2021-2029 Housing Element is a housing policy document which encourages the development of housing projects and would not approve any individual development projects; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Therefore, the adoption of the 2021-2029 Housing Element would not result in the emissions of greenhouse gases. Although the Housing Element could lead to new residential developments, impacts would be less than significant because the developments would be subject to a number of regulations that directly or indirectly reduce climate change-related emissions and project specific greenhouse gas emission impacts would be required in compliance with CEQA. The adoption of the 2021-2029 Housing Element would have a less than significant impact on greenhouse gas emissions and its impact on the environment.

Mitigation Measures: No Mitigation Measures are required.

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

Less than Significant Impact. Below is a discussion of the 2021-2029 Housing Element's consistency with relevant plans and policies that govern climate change. Adoption of the 2021-2029 Housing Element would not approve any developments or suggest any modifications to existing plans, policies, or regulations regarding the emissions of greenhouse gases including California Title 24, the Energy

Efficiency Climate Action Plan, SCAG's 2020-2045 RTP/SCS, and others. Consistency analysis of new developments with applicable greenhouse gas emissions' plans, policies, or regulations will be required at development project proposal, in conformity with CEQA. Additionally, the analysis below demonstrates how the new residential developments in the future would not conflict with any applicable plans, policies, or regulations to further reduce GHG.

Consistency with California Title 24

New residential developments are required to comply with Title 24 of the California Building Efficiency Standards. Through this compliance, GHG emissions would be reduced by increasing energy efficiency, reducing indoor and outdoor water demand, and installing energy-efficient equipment. New residential developments are required to meet the 2019 mandatory measures of the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. HVAC systems would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. CALGreen incorporates and overlap with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements.

Consistency with the Energy Efficiency Climate Action Plan (EECAP)

The Energy Efficiency Climate Action Plan (EECAP) is a long-term vision and the city's commitment to reduce energy use, reduce fossil fuel emissions, and achieve energy efficiency, with a goal to achieve a 15% reduction in GHG emissions by the year 2020.⁴¹ In addition to demonstrating the City's ability to reduce GHG emission levels, the EECAP provides a series of goals and policies to meet energy efficiency, such as achieving maximum energy efficiency of existing housing, optimize nonresidential energy use, integrate energy-efficient features into new buildings and remodels that are compatible with existing community character, enhance the City's development framework to provide ongoing support for energy efficiency, align planning efforts with energy efficiency and conservation, maximize the use of shading and cooling, and achieve the 2020 water targets set in 2010 urban water management plan. The successful implementation of the EECAP would result in more energy efficient housing and buildings, while reducing GHG emissions. Foreseeable future housing developments would be consistent with EECAP's goals to integrate energy-efficient appliances in existing and new housing developments.

Consistency with SCAG's RTP/SCS

SCAG's 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8% reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19% reduction by 2035, and 21% reduction by 2040 compared to the 2005 level. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020-2045 RTP/SCS would result in more complete communities

41 City of Alhambra, Alhambra General Plan EIR, January 2019.

with a variety of transportation and housing choices, while reducing automobile use. Strategies and policies set forth in the 2020-2045 RTP/SCS can be grouped into the following two categories: (1) integrated growth forecast; and (2) reduction of vehicle trips and VMT.

Integrated Growth Forecast

As discussed in *Section 2.14*, the 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs to encourage housing development. The adoption of the 2021-2029 Housing Element would not result in physical alterations or approval of housing development projects. However, the adopted program would encourage local housing development with a goal to achieve the development of approximately 6,825 new housing units by the year 2029, as required by the 6th Cycle RHNA assigned by SCAG and HCD. As such, the adoption of the 2021-2029 Housing Element is consistent with the growth assumptions in the regional air plan.

Consistency with VMT Reduction Strategies and Policies

The SCS's goals and policies to reduce VMT focus on transportation and land use planning that include building mixed-use projects, locating residents closer to where they work and play, and designing communities so there is access to high quality mass transit service. The SCS identifies transportation network actions and strategies that are outside the City's jurisdiction and control, such as expanding the use of transit modes in sub-regions (e.g., bus rapid transit [BRT], rail, limited-stop service, and point-to-point express service utilizing the high-occupancy vehicle [HOV], and high-occupancy toll [HOT] lane networks). In areas without quality mass transit, the SCS identifies land use strategies to promote development patterns that result in fewer vehicles miles traveled and thus lower GHG emissions. Such land use strategies including local government adoption of updated zoning codes, General Plans, and other regulatory policies that promote neighborhood-oriented development, suburban villages, and revitalized main streets consistent with the 2020-2045 RTP/SCS.

The City's General Plan outlines goals and policies to reduce VMT and focus on transportation and land use planning that include the construction of compact developments, increasing accessibility to public transit, and facilitating walking and transit use. The City is highly urbanized with accessible public transit services including the Alhambra Community Transit, the Montebello Bus line, Metro buses, the Metrolink, and the Metro Gold Line. Public Transit would reduce VMT and GHG emissions as it would encourage residents and visitors to drive less and utilize community and public transit through buses, bicycles, and the Metrolink. The successful implementation of multimodal transportation and public transit is consistent with VMT reduction strategies and policies. The 2021-2029 Housing Element update would be consistent with the goals and policies in the City's General Plan regarding reducing VMT and GHG emissions since no development project is approved and no changes to existing General Plan regarding VMT and GHG is suggested. Future housing developments in the City would be required to conduct a consistency analysis with SCAG's RTP/SCS in conformance with CEQA and evaluation of VMT.

Based on the discussion above, the adoption of the 2021-2029 Housing Element would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

2.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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 plan has not been adopted, within 2 miles of a public airport or public use airport, Would the Project result in a safety hazard for people residing or working in the Project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. Hazardous materials are defined by the California Health and Safety Code 25501 as any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs. Therefore, the adoption of the 2021-2029 Housing Element update would not result in physical environmental impacts including routine transport, use, or disposal of hazardous materials. Therefore, its adoption would not result in potential impacts from hazards and hazardous material that may endanger residents or the environment. The potential impacts related to hazards and hazardous materials

for any specific future residential projects would be assessed at the time of development proposal. Therefore, the Project would result in no impact.

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?

No Impact. The Project would not 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 since the adoption of the 2021-2029 Housing Element would not result in any physical development or changes. Potential impacts related to hazards and hazardous materials for any specific future residential projects would be assessed at the time of the development project proposal. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Therefore, adoption of the 2021-2029 Housing Element would result in 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?

No Impact. The City is a part of the Alhambra Unified School District (AUSD). There are a total of 18 schools within the City: 13 schools are kindergarten through middle school (K-8) and 5 high schools (9-12).⁴² As previously mentioned, adoption of the 2021-2029 Housing Element would not result in physical changes including emitting hazardous emissions or requiring the handling of hazardous or acutely hazardous materials within one-quarter mile of any existing or proposed schools. The potential impacts related to hazards and hazardous materials for any specific future residential developments would be assessed at the time the projects are proposed. Therefore, adoption of the 2021-2029 Housing Element would result in no impact.

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. The 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs to encourage the orderly development of affordable housing units. No housing development is proposed or approved with the adoption of the 2021-2029 Housing Element; however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because the sites of proposed future residential projects would be evaluated against lists of hazardous materials sites compiled by databases including the California Department of Toxic Substances Control EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action site. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects would be assessed at

⁴² Alhambra Unified School District. Accessed June 2021. <https://www.ausd.us/>.

the time such projects are proposed. Therefore, impacts to hazardous material sites would be less than significant.

- e. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?*

No Impact. Airport-related hazards are generally associated with aircraft accidents, particularly during takeoffs and landings. Airport operation hazards include incompatible land uses, power transmission lines, wildlife hazards (e.g., bird strikes), and tall structures that penetrate the imaginary surfaces surrounding an airport. Additionally, there are no airports within the City or within 2 miles of the city limits.^{43,44} The adoption of the 2021-2029 Housing Element does not include site-specific design or development proposals. Therefore, the implementation of the Project would result in no impacts associated with airport-related hazards.

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

Less than Significant Impact. The 2021-2029 Housing Element would not impair the implementation or physically interfere with the City's emergency response plans. The 2021-2029 Housing Element does not include proposals or plans to alter existing and adopted emergency response plan or emergency evacuation plans, nor would it approve physical changes or development of any kind. Additionally, all real estate development are anticipated to develop within existing parcels and would not significantly encroach upon public rights-of-way. Therefore, future residential developments are not anticipated to impair implementation of or physically interfere with emergency travel routes. While the 2021-2029 Housing Element would encourage housing development in the future, all future development would be reviewed to ensure the projects are consistent with and would not impair the implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the 2021-2029 Housing Element would result in a less than significant impact regarding emergency or evacuation plans.

- g. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

Less than Significant Impact. The 2021-2029 Housing Element will not expose people to wildfire hazards since no development is proposed or would be approved. Future development would be consistent with the City's regulations related to fire safety and would not interfere with emergency response plans related to risk from fire (see also *Section 2.20* of this study). Therefore, the adoption of the 2021-2029 Housing Element would result in a less than significant impact relative to wildland fires.

43 City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

44 Google Maps. July 2021.

2.10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<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:				
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 off-site;	<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"/>

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

Less than Significant Impact. The 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs. Therefore, the adoption of the 2021-2029 Housing Element would not create discharges of any kind or change water quality standards such that surface or groundwater quality is substantially degraded. Residential projects completed to meet the RHNA are expected to be located on highly disturbed sites in urbanized areas or within nonvacant underutilized sites and the City has procedures and regulations in place to ensure would be no significant impacts associated with water quality as relating to real estate developments. Future development projects would adhere to all applicable City regulations including the City’s Storm Water Management and Discharge Control Ordinance which requires projects to incorporate construction and post construction Best Management Practices (BMPs). BMPs to ensure storm water runoff is controlled in a manner that would minimize water

quality degradation and would minimize future development projects' impacts on connecting water bodies. Additionally, all future development projects are required to conduct water quality impact assessments in compliance with CEQA guidelines where mitigation measures would be implemented as necessary to minimize potential project impacts. Project-specific effects would be assessed and determined during development project proposal. Therefore, the adoption of the 2021-2029 Housing Element would have a less than significant impact on water quality and water quality standards.

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. The City is a member of the San Gabriel Valley Municipal Water District (SGVMWD) and has the right to pump groundwater from the Main San Gabriel Basin and the Raymond Basin.⁴⁵ About 80% of the City's water comes from nine active wells drawn from the Main San Gabriel Basin. While Alhambra is not a member agency of the Upper San Gabriel Valley Municipal Water District (Upper District), it can purchase treated imported water from the Upper District and does so to obtain the remaining 20% of its supply. Adoption of the 2021-2029 Housing Element would not require the withdrawal of groundwater supplies or increase water use in general since no physical changes are proposed. The 2021-2029 Housing Element would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The 2021-2029 Housing Element would encourage future housing development and all future proposed developments would be required to conduct water usage assessments and the project's impacts to groundwater supplies in accordance with CEQA requirements. Mitigation measures would be implemented if necessary. Therefore, the adoption of the 2021-2029 Housing Element would have a less than significant impact on decreased groundwater supplies and groundwater recharge.

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;

Less than Significant Impact. Adoption of the 2021-2029 Housing Element would not alter the existing drainage pattern of the site or area. As previously mentioned, the adoption of 2021-2029 Housing Element would not result in any physical changes. Future development projects would be required to conduct erosion assessments and assess for impacts to streams and rivers in compliance with CEQA. Construction and operational BMPs to control potential erosion and siltation, and control flows and associated velocities to prevent erosion and impacts to the downstream drainage system would also be required on

⁴⁵ City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

a typical development project. As such, the Project's impacts on substantial erosion or siltation would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. The 2021-2029 Housing Element would not alter the existing drainage pattern of the site or area. Future development projects would be assessed for Project-specific effects during project proposal in compliance with CEQA and mitigation measures will be adopted as appropriate. Therefore, impacts to the amount of surface runoff would be less than significant.

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

Less than Significant Impact. As required by State law, all new residential development projects within the City would be subject to the City's National Pollutant Discharge Elimination System (NPDES) Stormwater Permit (No. CA-0047881) enforced by the Los Angeles Regional Water Quality Control Board (RWQCB). The NPDES Stormwater Permit requires that the City impose water quality and watershed protection measures for all development projects and prohibits discharges from causing violations of applicable water quality or from resulting in conditions that create a nuisance or water quality impairments in receiving waters. All future development proposed would adhere to all applicable City regulations including the City's Storm Water Management and Discharge Control Ordinance which requires projects to incorporate construction and postconstruction BMPs to ensure storm water runoff is controlled in a manner that would minimize water quality degradation. Since adoption of the 2021-2029 Housing Element would not generate any runoff water and future development projects are required to comply with existing regulations, plans and programs, in addition to conducting site specific assessments in compliance with CEQA, Project impacts related to generating runoff water is less than significant.

iv. impede or redirect flood flows?

Less than Significant Impact. As previously mentioned, the Project does not include and would not approve any physical developments. Therefore, the 2021-2029 Housing Element update would not 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 impede or redirect flood flows. Future development projects would be assessed for Project-specific effects to flood flows during project proposal in compliance with CEQA. Mitigation measures would be adopted as appropriate. Therefore, Project impacts to flood flows 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. Potential localized flooding can occur due to ponding caused by intense rainstorms and spillover from nearby flood control channels. However, flood control improvements locally

and in the surrounding region have removed Alhambra from the 100-year flood zone. The City would not be directly affected by dam failure from any of the dams located in the area, such as Devil's Gate Reservoir on the Arroyo Seco six miles north of Alhambra, or the Eaton Wash Reservoir on Eaton Wash four miles north of Alhambra.⁴⁶ Tsunamis and seiches are not a threat because Alhambra is not near the ocean or any other large body of water. Flooding problems in the City are limited to localized problem areas where drainage systems lack capacity to handle intense rainfall events. Additionally, potential impacts related to flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation, would be assessed at the time future development projects are proposed. Mitigation measures would be adopted as necessary, in conformance with CEQA. Therefore, impacts related to the Project 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 mentioned, the Project does not include and would not approve any physical developments or change any water quality control plans or sustainable groundwater management plans. Therefore, the 2021-2029 Housing Element update would not conflict with such plans. Future development projects would be required to comply with NPDES and the implementation of BMPs such as erosion, runoff, and sediment control. Assessment regarding impacts to water quality and ground water would also be required in compliance with CEQA. The NPDES requirements are determined at the time of building permit issuance. Since no physical alteration is proposed by the Project, no alterations are proposed for existing water quality and management plans, and future development projects are required to conduct individual assessments on a project-by-project basis, a less than significant impacts would occur.

⁴⁶ City of Alhambra. General Plan: "Health and Safety." Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

2.11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

a. Physically divide an established community?

No Impact. The 2021-2029 Housing Element update does not include and would not approve any physical developments. Therefore, the 2021-2029 Housing Element update would not create a barrier that physically divide an established community. While implementation of the 2021-2029 Housing Element would ultimately require rezoning in certain parts of the City, it is not considered an action slated for approval by this Project. Additionally, housing development encouraged by the 2021-2029 Housing Element would likely take place on existing parcels slated for development without interfering with established travel connections and roadways. The Housing Element would retain, continue, and enhance the City’s existing pattern of established communities. Although the Housing Element could lead to new residential development, impacts would be less than significant because each individual residential project is expected to conduct an individual assessment regarding land use impacts in accordance with CEQA. As such, no impact is anticipated by the adoption of the 2021-2029 Housing Element.

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 2021-2029 Housing Element would require updates to land use plans including updates to the General Plan Land Use Element and the existing zoning map. Any and all changes to existing land use plan, policy, or regulation adopted would be for the purpose of ensuring consistency throughout the General Plan document and for carrying out the goals stated within such documents. A consistency analysis of the Land Use Element goals with the 2021-2029 Housing Element is provided below.

City General Plan Land Use Element

Relevant Goals

- Goal LU-1** Preservation of the character of existing single-family neighborhoods.
- Goal LU-3** A high-quality overall community appearance and identity.
- Goal LU-4** Focal points throughout the City that encourage diverse public places and foster economic growth.

- Goal LU-6** A vital downtown Alhambra that retains the City’s traditional character.
- Goal LU-7** Maintenance and development of vital, attractive, and functional corridors and activity nodes.

The 2021-2029 Housing Element contains seven Housing Goals which would be implemented to meet the 6th Cycle RHNA assigned by HCD and SCAG. The first and second strategies involve the preservation and improvement of the existing housing supply, as well as assisting in maintenance and production of a wide range of housing type to meet existing and future housing needs. The preservation elements of the Housing Element align with goals LU-1, LU-6, and LU-7’s of the City’s General Plan Land Use element. The perseveration and maintenance of existing housing will assist in the preservation of the character of existing single-family neighborhoods, the traditional character of the City’s downtown, and maintain the vital, attractive, and functional corridors and activity nodes. It will also aid the future housing needs path for the City of Alhambra.

Housing Goals 3, 4, 5, and 6 would address housing needs and incentivize quality housing production while ensuring fair housing for all. These strategies align with the Land Use Element goals LU-3, LU-4, and LU-7, which focuses on high quality overall community appearance while fostering attractive and functional corridors that foster economic growth. Organized development and economic growth would enhance the vitality and appearance of the City and enforcement of fair housing would reduce the burden of housing cost on the City’s residents, reduce homelessness, and also enhance the economic vitality and appearance of the City. Housing Goal 7 would ensure that the City’s housing goals are met and in accordance with the State law and General Plan.

Additionally, all new development projects would be required to assess for project consistency with existing land use plans, policies, and regulations, including consistency with existing land use goals. Any potential impacts related to land use and planning for any specific future residential projects would be assessed at the time the development projects are proposed. Mitigation measures would then be adopted as necessary to mitigate any inconsistencies, in conformance with CEQA. Based on the above, adoption of the 2021-2029 Housing Element would result in a less than significant impact on land use and planning.

2.12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?

No Impact. The City’s mineral resources are described in the San Gabriel Valley P-C Region Showing Mineral Resource Zones-2 Areas and Active Mine Operations, on behalf of the California Department of Conservation. The City does not contain any areas classified by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources as a Mineral Resource Area.⁴⁷ Soil types found in the City, such as gravelly loams, sandy loams, and clays, do not contain any significant number of mineral resources. Moreover, the adoption of the 2021-2029 Housing Element would not approve any development projects and would not result in loss of availability of a known mineral that would be of future value. Therefore, there would be no impacts to mineral resources.

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?

No Impact. As previously mentioned, the City does not contain areas that are classified by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources as a Mineral Resource Area.⁴⁸ No potential impacts to known local, regional, or State mineral resources of value would occur because the adoption of the 2021-2029 Housing Element update would not approve any development projects and/or result in any physical alterations and future housing development would not be located within an area containing significant mineral resources. Therefore, the Project would have no impacts to mineral resources.

47 California Department of Conservation, California Geological Survey (CGS). 2010. San Gabriel Region showing MRZ-2. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/. Accessed June 2021.

48 California Department of Conservation, California Geological Survey (CGS). 2010. San Gabriel Region showing MRZ-2. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/. Accessed June 2021.

2.13 Noise and Vibration

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground-borne 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 2 miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Generation of a substantial temporary or permanent increase in ambient noise levels the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. As discussed previously, the 2021-2029 Housing Element is a housing policy document which encourages the development of housing projects and would not approve any individual development projects. Therefore, the adoption of the 2021-2029 Housing Element would not result in any substantial temporary or permanent increase in ambient noise levels within the vicinity of the Project. It should be noted that new residential developments would either directly or indirectly generate temporary or permanent increase in ambient noise levels and assessments would be required at a project specific level in compliance with CEQA. The adoption of the 2021-2029 Housing Element would have a less than significant impact on greenhouse gas emissions and its impact on the environment. Below is a general description of the existing environmental and regulatory setting within the City.

Environmental Setting

Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack thereof, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise sensitive, especially during the nighttime hours.

Local Regulatory Setting

The Noise Ordinance for the City establishes noise standards to control unnecessary, excessive, and annoying noise and vibration in the City. Chapter 18.02.060 of the AMC exempts noise and vibration activities due to operation of any tools or equipment for construction or repair work, provided the activities do not take place outside the hours of 7:00 AM and 7:00 PM at any time on weekdays, including Saturdays, Sundays, or holidays.⁴⁹ The City has not established quantitative construction equipment noise level standards.

Chapter 18.02.050 of the AMC establishes allowable noise levels by time and land use, as shown in *Table 5-City Noise Standards (dBA)*.

TABLE 5 CITY NOISE STANDARDS (dBA)	
Noise Zone	Allowable Noise Level (dBA)
Residential	55
Commercial	70
Mixed-Use	60

Source: Alhambra Municipal Code (AMC), Chapter 18.02.050.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

Future Housing Development

Construction activities during project development would generate both steady-state and episodic noise that would be heard both on and off a project site. Each construction phase would involve the use of different types of construction equipment and, therefore, have its own distinct noise characteristics. To reduce maximum construction noise levels, it is assumed residential development would implement typical BMPs, such as optimal muffler systems for all equipment.. If mitigation measures are deemed necessary during individual development assessments, then mitigation measures would be incorporated

49 City of Alhambra Municipal Code, “Chapter 18.02: Noise Standards.”

in conformance with CEQA requirements which would further mitigate construction noise impacts from individual development projects.

New residential developments would introduce various stationary noise sources, including HVAC systems. All mechanical equipment would be required to be designed with appropriate noise-control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls, to comply with noise-limitation requirements provided in Chapter 18.02.050 of the AMC. The City's existing General Plan policies, such as Policy HS-6A and 6B would protect residents from excessive stationary noise sources and ensure new land uses meet the AMC's noise standards through evaluation and design considerations. Thus, stationary and other sources of noise would be controlled by General Plan goals and policies, and the AMC, which limit allowable noise levels at adjacent properties. Therefore, through compliance with the requirements in Chapter 18.02 of the AMC and building permit approval subsequent to the City's development review process, operation of mechanical equipment for future housing developments would be designed to not exceed the City's threshold of significance and impacts would be less than significant.

The adoption of the 2021-2029 Housing Element would have a less than significant impact on greenhouse gas emissions and its impact on the environment.

Mitigation Measures: No Mitigation Measures are required.

b. Generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant Impact. Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at its highest levels. Ground-borne vibration from construction activities rarely reaches the levels that damage structures. Potential building damage occurs when construction activities cause ground-borne vibration levels to exceed 0.2 inches-per second peak particle velocity (PPV) at the nearest off-site sensitive receptors.

Regarding vibration, Chapter 18.02.100 of the AMC states that no person or use create, maintain, or cause any ground vibration which is perceptible without instruments at any point on any affected property adjoining the property on which the vibration source is located. The City identifies a perception threshold of more than 0.05 inches per root-mean square (RMS) vertical velocity. As discussed previously, Chapter 18.02.060 of the AMC exempts noise and vibration activities from construction if construction activities do not occur outside the hours of 7:00 AM to 7:00 PM on weekday hours, including Saturdays, Sundays, and holidays.

The Housing Element does not propose or approve a specific housing development. All future residential units would be subjected to environmental review for vibration impacts and all construction vibrations would be exempt if the developments comply with AMC regulations. Vibration impacts would be less than significant.

Mitigation Measures: No Mitigation Measures are required.

- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?*

No Impact. The City is not within the vicinity of a private airstrip or an airport land use plan. The closest airport to the City is the San Gabriel Valley Airport located approximately 5.45 miles northeast of the City. Therefore, no impacts would occur.

Mitigation Measures: No Mitigation Measures are required.

2.14 Population, Employment and Housing

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<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"/>

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

Less than Significant Impact. The 2021-2029 Housing Element is a policy document, consisting of housing strategies and programs to encourage housing development. The adoption of the 2021-2029 Housing Element would not result in physical alterations or approval of housing development projects; however, it commits the City to redesignate and rezone certain areas for future housing. The 2021-2029 Housing Element would encourage local housing development with a goal to achieve the development of approximately 6,825 new housing units by the year 2029, as required by the 6th Cycle RHNA assigned by SCAG and HCD. The average household size in Alhambra is 2.82 people per household. In the event the City fulfills the development of 6,825 units assigned by the 6th Cycle RHNA, the developments would generate approximately 19,246 people in the City. SCAG estimates the 2016 population in Alhambra is approximately 86,600 and would increase to 91,200 in 2045, a 4,600 increase. Additionally, the number of households in the city estimated to increase from 29,900 in 2016 to 32,000 in 2045, a 2,100-household increase. Based on the types of housing proposed, the population generated by individual developments would vary and the overall population generated by housing developments would vary accordingly.

Implementation of the programs contained in the 2021-2029 Housing Element document would accommodate development required to meet the City’s RHNA allocation and future development would occur on vacant or underutilized sites with existing connections to utilities and be serviced by existing public services. A portion of the housing development would also result in the accommodation of existing housing need and reduce the amount of population generated by the estimate. With the implementation of rezoning and additional programs in the 2021-2029 Housing Element, it is anticipated the population generated to comply with the 6th Cycle RHNA would be properly accommodated. Additionally, increase in population and households would be spread out throughout the 2021-2029 Housing Element implementation period and each individual development proposal would be required to conduct population growth impact analysis during its project entitlement phase as required by CEQA. As the adoption of the 2021-2029 Housing Element would not result in physical alterations of land or approve

the development of housing projects, and all future developments are required to conduct individual population growth analysis as required by CEQA, the adoption of the 2021-2029 Housing Element would not induce substantial population growth in the City.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less than Significant Impact. The proposed Housing Element is a policy-level document that encourages, but does not require, the provision of a range of housing types and affordability levels. The proposed Housing Element Update does not approve any physical developments and would not displace any persons from existing land uses. Development projects with any proposed removal or displacement of people would be required to conduct displacement studies in accordance with CEQA and incorporate mitigation measures as appropriate. Adoption of the 2021-2029 Housing Element update would not result in the displacement of any people or group of people, impacts are less than significant.

2.15 Public Services

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

Less than Significant Impact. A letter requesting information was sent on July 19th, 2021, and can be found in *Appendix A-Information Request Letters*. A response has not been received at this time. Adoption of the 2021-2029 Housing Element would not approve any development projects and would not require fire protection services for new developments. Therefore, service ratios and response times would not be affected. Due to the nature of the Project, no additional fire protection facilities or expansion of existing facilities would need to be constructed. However, the Housing Element commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because future housing developments would be required to go through the entitlement process and conduct the necessary studies for impacts to public services, including fire protection. Therefore, no significant impact would occur, and no mitigation is required.

ii. Police protection?

Less than Significant Impact. A letter requesting information was sent on July 19th, 2021, and can be found in *Appendix A*. A response has not been received at this time. Adoption of the 2021-2029 Housing Element would not approve any development projects. Adoption of the 2021-2029 Housing Element would not require police protection services; therefore, service ratios and response times would not be affected. Due to the nature of the Project, no additional police protection facilities or expansion of existing facilities would need to be constructed. However, the Housing Element commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than

significant because future developments would be required to go through the entitlement process and conduct the necessary studies for impacts to public services, including police protection. Therefore, no significant impact would occur, and no mitigation is required.

iii. Schools?

Less Than Significant Impact. A letter requesting information was sent on July 19th, 2021, and can be found in *Appendix A*. A response has not been received at this time. Adoption of the 2021-2029 Housing Element would not approve any development projects. Adoption of the 2021-2029 Housing Element would not build housing and would not bring youth to the area, resulting in no increase in enrollment at nearby schools. Therefore, it would not increase the need for public education services in the area and no significant impacts would occur. However, the Housing Element commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because future developments would be required to go through the entitlement process and conduct the necessary studies for impacts to public services, including schools. New residential developments would also be subject to an impact fee that is collected by the Alhambra Unified School District (AUSD) at the time of permit issuance. Fees collected by AUSD are used for the provision of additional and reconstructed or modernized school facilities. Pursuant to Government Code §65995(3)(h), payment of statutory fees is deemed to be full and complete mitigation of impacts. Impacts would be less than significant.

iv. Parks?

Less Than Significant Impact. A letter requesting information was sent on July 19th, 2021, and can be found in *Appendix A*. This analysis is based, in part, on information provided by the Michael Macias, Director of Parks and Recreation for the City, which was received on August 2nd, 2021, and is included in *Appendix B-Responses for Information Request Letters* of this Initial Study. Based on the information, it was concluded that there would be no impact to park facilities within the Project site.

Provided below is a list of parks within the City:

- Alhambra Park (12.63 acres) Open grass area, picnic tables, Covered picnic shelters, barbeques, playground, restrooms, tennis courts, exercise equipment, swimming pool, splash pad, outdoor bandshell, and basketball court.
- Almansor Park (22.7 acres) Open grass area, picnic tables, covered picnic shelters, barbeques, playground equipment, restrooms, gymnasium, ballfields, soccer fields, tennis courts, exercise course, outdoor basketball courts, and walking/jogging trail.
- Granada Park (16.1 acres) Open grass area, picnic tables, covered picnic shelters, barbeques, playground equipment, restrooms, tennis courts, ballfields, swimming pool, and gymnasium.
- Story Park (7.47 acres) Open grass area, picnic tables, barbeques, playground equipment, volleyball court, tennis courts, ballfield, and restrooms.
- Emery Park (.86 acre) Open grass area, playground, picnic tables, and restrooms.
- Burke Park (1 acre) Open Grass area, Xeriscape Garden, and Historical Museum.
- Moor Field (17.79 acres) Ballfields, and open grass area.

All the parks in the City operate Monday through Sunday from 5:00 AM to 10:30 PM. Currently, Alhambra Park has 1.17 park acres per 1,000 residents, Almansor Park has 3.05 park acres per 1,000 residents, Burke Park has 0.12 park acres per 1,000 residents, Emery Park has 0.17 park acres per person, Granada Park has 1.37 park acres per 1,000 residents, Moor Park has 0.79 park acres per 1,000 residents, and Story Park has 0.69 park acres per 1,000 residents.⁵⁰

The adoption of the 2021-2029 Housing Element would not approve any physical developments and would not physically affect the use of parks in the area. Therefore, the adoption of the 2021-2029 Housing Element would not result in the need for new park facilities. However, the Housing Element commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because future developments would be required to conduct recreational services capacity analysis in accordance with CEQA. Additionally, all new residential development (except housing for seniors or disabled persons that are owned and operated by nonprofit foundations for corporations) is subject to an impact fee, new construction tax, calculated on a per-unit basis and collected by the City at the time of permit issuance. Currently this is established by ordinance at \$2,000 per unit.⁵¹ The tax is applied to the panning, improvement, and expansion of public parks, playgrounds, and recreation facilities to serve the increasing population of the City and the means of providing additional revenues with which to finance such public facilities. Mitigation measures would be adopted, as necessary. Based on the analysis provided, there would be a less than significant impact to recreational resources.

v. Other public services?

Less Than Significant Impact. A letter requesting information was sent on July 19th, 2021, and can be found in *Appendix A*. This analysis is based, in part, on information provided by the Library Director received on July 29th, 2021, which is included in *Appendix B* of this Initial Study. Based on the information, it was concluded that there would be no impacts to library facilities with the adoption of the 2021-2029 Housing Element.

The Alhambra Civic Center Library is located on 101 S. First Street and it is approximately 45,000 square feet. The library's current budget provides funding for 39 employees in the facility. The inventory includes 105,370 volumes for the physical library and 2,500 books for mobile library services.⁵² The physical library is a 2-story facility, offering a community meeting room (Reese Hall), and several study rooms. On the first floor, there is a copy center, discovery center (makerspace) and also a small office currently used by the Housing Rights Center (on Fridays). The 2nd floor features a small outside terrace and a library foundation bookstore. All of these spaces are accessible to the public. According to written correspondence from the Library Director, Hilda LohGuan, library team has observed the current facilities

50 Parks and Recreation Information Request Letter Response from Michael Macias, Director of Parks and Recreation for the City of Alhambra.

51 City of Alhambra Municipal Code, "Chapter 5.06: New Construction Tax."

52 Libraries Information Request Letter Response from Hilda LohGuan, Library Director for the City of Alhambra.

are adequate in meeting in-person service demands. Further, in June 2021, the library launched the mobile library, allowing us to enhance our capacity and ability to connect and provide service to members in different parts of the City.⁵³ There are no current plans to build additional library facilities or expanding the existing building.⁵⁴

Adoption of the 2021-2029 Housing Element would not approve any development projects. The Project would not include construction of new private housing or buildings that would result in increased demand in public facilities however, it commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. As noted in the written correspondence of the Library Director, as residential developments are proposed and activity and service demands increase, additional supports to the library's facilities maintenance increases as well—for example, elevator maintenance (there are several inside and also outside to the parking garage), and the flooring of the outside terrace areas.⁵⁵ Although the Housing Element could lead to new residential development, impacts would be less than significant because future developments would be required to go through the entitlement process and conduct the necessary studies for the impacts to public services as required by CEQA. Therefore, impacts would be less than significant.

53 Libraries Information Request Letter Response from Hilda LohGuan, Library Director for the City of Alhambra.

54 Libraries Information Request Letter Response from Hilda LohGuan, Library Director for the City of Alhambra.

55 Libraries Information Request Letter Response from Hilda LohGuan, Library Director for the City of Alhambra.

2.16 Recreation

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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. As mentioned in Section 2.15.iv- Public Services, the following parks are located within the City:

- Alhambra Park (12.63 acres) Open grass area, picnic tables, Covered picnic shelters, barbeques, playground, restrooms, tennis courts, exercise equipment, swimming pool, splash pad, outdoor bandshell, and basketball court.
- Almansor Park (22.7 acres) Open grass area, picnic tables, covered picnic shelters, barbeques, playground equipment, restrooms, gymnasium, ballfields, soccer fields, tennis courts, exercise course, outdoor basketball courts, and walking/jogging trail.
- Granada Park (16.1 acres) Open grass area, picnic tables, covered picnic shelters, barbeques, playground equipment, restrooms, tennis courts, ballfields, swimming pool, and gymnasium.
- Story Park (7.47 acres) Open grass area, picnic tables, barbeques, playground equipment, volleyball court, tennis courts, ballfield, and restrooms.
- Emery Park (.86 acre) Open grass area, playground, picnic tables, and restrooms.
- Burke Park (1 acre) Open Grass area, Xeriscape Garden, and Historical Museum.
- Moor Field (17.79 acres) Ballfields, and open grass area.

The 2021-2029 Housing Element is a policy document, consisting of a housing program. Therefore, its adoption would not create increased population or usage or existing neighborhood and regional parks or other recreational facilities. However, implementation of the programs contained in the Housing Element would encourage housing development. The Project does not propose or approve development projects of any kind, including those that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. All future development projects are required to conduct

assessments on increased recreational facility usage in conformance with CEQA. Assessments of increased neighborhood and regional parks' usage would be conducted when a development project is proposed. All new residential development (except housing for seniors or disabled persons that are owned and operated by nonprofit foundations for corporations) is subject to an impact fee, new construction tax, calculated on a per-unit basis and collected by the City at the time of permit issuance. Currently this is established by ordinance at \$2,000 per unit.⁵⁶ The tax is applied to the panning, improvement, and expansion of public parks, playgrounds, and recreation facilities to serve the increasing population of the City and the means of providing additional revenues with which to finance such public facilities. Adoption of the 2021-2029 Housing Element would have a less than significant impact on existing recreational facilities.

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 Impact. Additional residential development may result in the increased use of existing recreational facilities or the need for construction or expansion of recreational facilities to meet the needs of new residents. According to written correspondence from the Director of Parks and Recreation for the City included in *Appendix A* and *Appendix B*, the Parks and Recreation Department is actively pursuing grant funding to enhance and expand park offerings.⁵⁷ The availability, maintenance, and management of park and recreation facilities are covered under the General Plan and the City's Parks and Recreation Facilities. All new residential development (except housing for seniors or disabled persons that are owned and operated by nonprofit foundations for corporations) is subject to an impact fee, new construction tax, calculated on a per-unit basis and collected by the City at the time of permit issuance. Currently this is established by ordinance at \$2,000 per unit.⁵⁸ The tax is applied to the panning, improvement, and expansion of public parks, playgrounds, and recreation facilities to serve the increasing population of the City and the means of providing additional revenues with which to finance such public facilities. The potential impacts related to recreation for any specific future residential projects would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Based on the above, adoption of the 2021-2029 Housing Element would have a less than significant impact on recreational facilities.

56 City of Alhambra Municipal Code, "Chapter 5.06: New Construction Tax."

57 Parks and Recreation Information Request Letter Response from Michael Macias, Director of Parks and Recreation for the City of Alhambra.

58 City of Alhambra Municipal Code, "Chapter 5.06: New Construction Tax."

2.17 Transportation and Circulation

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. Adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any physical developments. The 2021-2029 Housing Element would also not suggest changes to any existing program plans, ordinances, or policy addressing the circulation system. However, the Housing Element would commit the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because all development proposals are required to conduct CEQA analysis pertaining to its project conflicts with an existing program plan, ordinance, or policy addressing the circulation system as required by CEQA. Prior to issuance of any building permit, all project applicants are required to pay development impact fees that would address potential traffic impacts. Therefore, the adoption of the 2021-2029 Housing Element would not conflict with any program, plan, ordinance, or policy addressing the circulation system; no impact would occur.

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

Less than Significant Impact. Adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any physical developments. As such, the Project would not induce any additional VMT above the existing level. The 2021-2029 Housing Element would encourage housing development and would commit the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because all development proposals are required to conduct site specific CEQA VMT analysis pertaining to its impacts and consistency with CEQA Guidelines section 15064.3 subdivision (b) as required by CEQA and mitigation measures would be implemented, as necessary.

Therefore, the adoption of the 2021-2029 Housing Element would not induce any additional VMT through physical development of housing projects and no conflicts would occur. Impacts would be less than significant.

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

No Impact. The 2021-2029 Housing Element is a policy-level document that does not provide for specific development or design proposals such as emergency access, site design, or parking. Future development would be required to comply with General Plan policies and City Standards and Specifications related to traffic and circulation, as well as City development standards for roadway improvements and driveway design. Compliance with these requirements is verified at the time of development permit approval (i.e., grading, building) and would therefore remain unaffected by the Project. As a result, the Project would have no impact related to increasing hazards due to design features and incompatible uses or resulting in inadequate emergency access.

d. Result in inadequate emergency access?

No Impact. The proposed Housing Element is a policy-level document and does not include specific development or design proposals. No proposals for alteration of emergency access is proposed. Therefore, the proposed Project would not impact existing emergency service capacity, access routes, facilities, or plans in the City.

2.18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
<p>Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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 the cultural value to a California Native American tribe, and that is:</p>				
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>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 PRC Section 5024.1? In applying the criteria set forth in subdivision (d) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

Less than Significant Impact. In accordance with SB 18 which requires consultation with tribes included on the contact list maintained by the Native American Heritage Commission (see *Appendix C-NAHC Response Letter*) for long-range planning projects, including General Plan Element updates, tribal notification letters were mailed and emailed to seven tribal representatives between May 18th, 2021, and May 26th, 2021 (see *Appendix D-Tribal Notification Letters*). The tribes contacted are as follows: Gabrieleno Band of Mission Indians-Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseno Indians. The 90-day notification period in accordance with SB 18 was due on August 24th, 2021. No request for consultation was received.

The 2021-2029 Housing Element is a policy document, consisting of a housing program. As such, adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any real estate developments. However, implementation of the programs contained in the document would encourage residential development required to meet the City’s 6th Cycle RHNA allocation. As discussed under *Section 2.5- Cultural Resources*, future development in the City would be required to comply with the General Plan Resources Element containing policies for the protection of cultural resources, including Policies R-6E and R-6F, and all new development would be required to be consistent with these policies. Additionally, future development would be required to follow the protocol pursuant to Assembly Bill 52 regarding notification and consultation with Native American Tribes. Potential impacts to tribal cultural resources of any specific future residential projects would be assessed at the time the developments are

proposed. Mitigation measures would be adopted as necessary, in conformance with CEQA. Based on the above, the adoption of the 2021-2029 Housing Element would result in less than significant impacts to tribal cultural and historical resources.

- 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 PRC Section 5024.1? In applying the criteria set forth in subdivision (d) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less than Significant Impact. As discussed previously, notification in compliance with SB 18 was initiated and tribal notification letters were sent to seven tribes. No responses were received during the 90-day notification period.

The 2021-2029 Housing Element is a policy document, consisting of a housing program. As such, adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any real estate developments. However, implementation of the programs contained in the document would encourage residential development required to meet the City's 6th Cycle RHNA allocation. As discussed under *Section 2.5*, future development in the City would be required to comply with the General Plan Resources Element containing policies for the protection of cultural resources, including Policies R-6E and R-6F, and all new development would be required to be consistent with these policies. Additionally, future development would be required to follow the protocol pursuant to Assembly Bill 52 regarding notification and consultation with Native American Tribes. Potential impacts to tribal cultural resources of any specific future residential projects would be assessed at the time the developments are proposed. Mitigation measures would be adopted as necessary, in conformance with CEQA. Based on the above, the adoption of the 2021-2029 Housing Element would result in less than significant impacts to tribal cultural and historical resources.

2.19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new and expanded entitlements needed?	<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"/>

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

Less Than Significant Impact. Adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any physical developments. As such, no change in demand for utility services would result from the adoption of the 2021-2029 Housing Element.

Future development within the City would alter the demand for utilities such as domestic water service, including water supplies, stormwater system, and wastewater treatment capacity, or individual wells and septic systems. Proposed development projects would be required to assess for project impacts on existing utilities during project approval and in accordance with CEQA requirements. All future housing development are expected to develop on sites with existing utility services as the City is built out and utility services, such as stormwater drainage, electric power, natural gas, and telecommunications facilities are widely available. Development of future housing would require the replacement of old and installation of new utility infrastructure to serve the proposed development. The installation of infrastructure would occur during site construction and the depths and locations would be considered in the grading plan. Impacts related to construction of on-site utilities infrastructure would not result in

any unique or more intensive types of impacts than the grading required to support development. All future development must comply with the California Building Code, City's Standard Specifications, and would be required to submit payment for development impact fees prior to connection. The fees are used to maintain and expand existing utility infrastructure as needed. Additionally, the City evaluates the capacity of utilities and service systems regularly and is required to publish reports to the public on water quality, and to the state on wastewater capacity. These reports would assist in future utility capacity determination to ensure there is enough service capacity for new developments. Since the development of future housing would not require the relocation or upgrade of utility services off-site and the impacts associated with the installation and extension of infrastructure onsite as well as the off-site connections would be temporary and conducted in accordance with the routine construction control methods, development of future housing would result in less than significant impacts.

Based on the analysis provided, adoption of the 2021-2029 Housing Element would not result in change in utility capacity and no relocation or construction of expanded utility facilities. Although the Housing Element could lead to new residential development, impacts would be less than significant because all future development projects would be required to conduct utility services assessments and submit development impact fees to help maintain or expand existing utility services. Impacts to utilities relocation and expansion would be less than significant.

b. Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new and expanded entitlements needed?

Less Than Significant Impact. Adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any physical developments. As such, no change in demand for water supplies would result from the adoption of the 2021-2029 Housing Element. Future development within the City would alter the demand for water supplies and impacts of such changes would need to be evaluated during individual development proposal. Although the Housing Element could lead to new residential development, impacts would be less than significant because proposed development projects would be required to assess for project impacts on water supply during project approval and in accordance with CEQA requirements. Mitigation measures would be implemented if necessary. All future development must comply with the California Building Code, City's Standard Specifications, and would be required to submit payment for development impact fees prior to connection. The fees are used to maintain and expand existing utility infrastructure as needed. Additionally, the City evaluates the capacity of utilities and service systems regularly and is required to publish reports to the public on available water supplies in the region. These reports would assist in future available water supply determination to ensure there is enough water available to service new developments.

Based on the analysis provided, adoption of the 2021-2029 Housing Element would not result in changes to the availability of water supplies. Additionally, all future development projects would be required to conduct utility services assessments and submit development impact fees to help maintain or expand existing utility services. Impacts to available water supplies would be 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's projected demand in addition to the provider's existing commitments?***

Less Than Significant Impact. Adoption of the 2021-2029 Housing Element would not approve any physical alterations or approve any physical developments. As such, no change in wastewater treatment capacity would result from the adoption of the 2021-2029 Housing Element. Adoption of the Housing Element commits the City to redesignate and rezone certain areas for future housing and could therefore have indirect impacts. Future development within the City would alter the demand for wastewater treatment capacity and impacts of such changes would need to be evaluated during individual development proposal. Although the Housing Element could lead to new residential development, impacts would be less than significant because the Los Angeles County Sanitation District (LACSD) indicates that presently no deficiencies exist in the LACSD facilities that serve the City.⁵⁹ Proposed development projects would be required to assess for project impacts on wastewater treatment capacity during project approval and in accordance with CEQA requirements. Mitigation measures would be implemented if necessary. All future development must comply with the California Building Code, City's Standard Specifications, and would be required to submit payment for development impact fees prior to connection. The fees are used to maintain and expand existing utility infrastructure as needed. Additionally, the City evaluates the capacity of utilities and service systems regularly and is required to publish reports to the public on the wastewater treatment capacity in the region. These reports would assist in determining the need for wastewater treatment capacity expansion to service new developments.

Based on the analysis provided, adoption of the 2021-2029 Housing Element would not result in changes to the wastewater treatment capacity. No deficiencies exist in the LACSD facilities that would serve future housing developments in the City. Additionally, all future development projects would be required to conduct utility services assessments and submit development impact fees to help maintain or expand existing utility services. Impacts to wastewater treatment capacity would be less than significant.

- 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. The 2021-2029 Housing Element is a policy-level document that encourages the development of a variety of housing types and affordability levels and does not include the approval of specific development proposals. As such, no solid waste would be generated and the adoption of the 2021-2029 Housing Element would not otherwise impair the attainment of solid waste reduction goals. Future developments would be required to conduct solid waste generation assessments in compliance

⁵⁹ City of Alhambra, Alhambra General Plan EIR, January 2019

with CEQA and mitigation measures would be adopted, as necessary. Therefore, adoption of the 2021-2029 Housing Element would not 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. Adoption of the 2021-2029 Housing Element would have a less than significant impact regarding solid waste.

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

Less than Significant Impact. The 2021-2029 Housing Element is a policy-level document that encourages the provision of a variety of housing types and affordability levels and does not include specific development proposals. As such, no solid waste would be generated through the adoption of the 2021-2029 Housing Element. Future developments would be required to conduct solid waste generation and consistency assessments in compliance with CEQA and mitigation measures would be adopted, as necessary. Therefore, the adoption of the 2021-2029 Housing Element would not generate any solid waste and would comply with federal, State, and local management and reduction statutes and regulation related to solid waste. Impacts would be less than significant.

2.20 Wildfire

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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"/>
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"/>

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

Less than Significant Impact. Wildland fire protection in California is the responsibility of either the local government, State, or the federal government. State Responsibility Areas (SRA) are the areas in the State where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the Cal Fire provides a basic level of wildland fire prevention and protection services.

As a built-out community in an urbanized area, the City is not subject to substantial wildfire risk.⁶⁰ There are no wildlands located in the vicinity of the City limits. The City does not contain a Very High Fire Hazard Severity Zone, nor does it contain a fire buffer zone.⁶¹ The City is not located in or near SRAs or lands classified as very high fire hazard severity zones. Future development would be reviewed for consistency with fire protection development standards and hazard abatement. Specifically, individual projects would be required to comply with existing policies and regulations to offset fire risks by incorporating project features such as weed abatement, adequate emergency vehicle access, use of noncombustible building materials, and adequate water pressure to ensure fire safety. The potential impacts related to wildland fire for any specific future residential projects would be assessed at the time the developments are proposed. Future developments would be required to conduct wildfire impact

60 City of Alhambra. General Plan: “Health and Safety.” Accessed June 2021. <https://www.Cityofalhambra.org/resources/general-plan-update>.

61 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed June 2021.

assessments in accordance with CEQA and comply with existing wildfire plans, policies, and regulations. Therefore, impacts related to wildfire 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 a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. There are no wildlands located within or in the vicinity of the City limits. The City does not contain Very High Fire Hazard Severity Zone,⁶² nor does it contain or is adjacent to a fire buffer zone. There are no appreciable slopes in the City. The City is not located in or near SRAs or lands classified as very high fire hazard severity zones. Future development would be reviewed for consistency with fire protection development standards and hazard abatement. Specifically, individual projects would be required to comply with existing policies and regulations to offset fire risks by incorporating project features such as weed abatement, adequate emergency vehicle access, use of noncombustible building materials, and adequate water pressure to ensure fire safety. The potential impacts related to wildland fire for any specific future residential projects would be assessed at the time the developments are proposed. Future developments would be required to conduct wildfire impact assessments in accordance with CEQA and comply with existing wildfire plans, policies, and regulations. Therefore, impacts related to wildfire would be less than significant.

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?

Less than Significant Impact. There are no wildlands located within or in the vicinity of the city limits. Thus, development projects would not require the installation of any wildland fire protection infrastructure beyond normal fire suppression requirements of the AMC. Future development would be reviewed for consistency with fire protection development standards and hazard abatement as required by CEQA and the project approval process. Specifically, individual projects would be required to comply with existing policies and regulations to offset fire risks by incorporating project features such as weed abatement, adequate emergency vehicle access, use of noncombustible building materials, and adequate water pressure to ensure fire safety. The potential impacts related to wildland fire for any specific future residential projects would be assessed at the time the developments are proposed. Future developments would be required to conduct wildfire impact assessments in accordance with CEQA and comply with existing wildfire plans, policies, and regulations. Therefore, impacts related to wildfire would be less than significant.

62 CALFIRE, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed June 2021.

- 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. There are no appreciable slopes within the City, nor would the adoption of the 2021-2029 Housing Element result in any physical alterations or approval of any development projects. Additionally, there are no wildlands located within or in the vicinity of the city limits. Future development would be reviewed for consistency with fire protection development standards and hazard abatement as required by CEQA and the project approval process. Specifically, individual projects would be required to comply with existing policies and regulations to offset fire risks by incorporating project features such as weed abatement, adequate emergency vehicle access, use of noncombustible building materials, and adequate water pressure to ensure fire safety. The potential impacts related to wildland fire for any specific future residential projects would be assessed at the time the developments are proposed. Future developments would be required to conduct wildfire impact assessments in accordance with CEQA and comply with existing wildfire plans, policies, and regulations. Therefore, impacts related to wildfire would be less than significant.

2.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
a. Does the Project have the potential to 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, 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 projects, 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 would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Does the Project have the potential to 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, 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 Impacts. The 2021-2029 Housing Element update is a policy document consisting of housing programs. The adoption of the 2021-2029 Housing Element update would not approve any physical alterations to the land and would not result in physical environmental impacts. Although the Housing Element could lead to new residential development, impacts would be less than significant because of the reasons discussed below.

Additionally, as discussed in *Threshold 2.4-Biological Resources*, the City General Plan: Resources Element (2019) states that while wildlife inhabits urban areas, no rare or endangered plant or animal species permanently reside within the city limits. Occasionally, migratory birds may stop in Alhambra’s parks and green spaces, including the Alhambra Golf Course. Compliance with the Migratory Bird Treaty Act would reduce impacts to migratory birds to a less than significant level. Therefore, future housing development projects are not anticipated to eliminate any native wildlife habitat or sensitive plant communities and would not affect any important habitat linkages that could support sensitive species, the developments would not result in a substantial adverse effect on any candidate, sensitive, or special-status species.

Adoption of the 2021-2029 Housing Element would not approve any developments. Depending on the location, future housing development in the City may have the potential to affect biological resources. Although the Housing Element could lead to new residential development, these future developments would not degrade the quality of the environment or substantially reduce the habitat of a fish or wildlife species because future housing development projects would be required to comply with CEQA and conduct necessary biological studies as part of its entitlement process. Mitigation measures would be adopted as necessary, in conformance with CEQA. Therefore, there would be a less than significant impact to candidate, sensitive, or special status species.

b. Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impacts. As mentioned previously, the 2021-2029 Housing Element update is a policy document consisting of housing programs and would not approve any physical alterations to the land and would not result in physical environmental impacts. Adoption of the 2021-2029 Housing Element would, therefore, not create any physical individual or cumulative impacts. The 2021-2029 Housing Element would encourage housing development in the City through its housing programs, however, impacts would be less than significant because all development projects are required to perform cumulative impact analyses when proposed. Any significant cumulative impacts would be required to be offset by establishing mitigation measures as appropriate. Therefore, cumulative impacts for the adoption of the 2021-2029 Housing Element would be less than significant.

c. Does the Project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impacts. As mentioned previously, the 2021-2029 Housing Element update is a policy document consisting of housing programs and would not approve any physical alterations to the land and would not result in physical environmental impacts. As such, the adoption of the 2021-2029 Housing Element would not alter the existing environmental conditions or create adverse effects on human beings. Although the 2021-2029 Housing Element could lead to new residential development, there would be a less than significant adverse effect on human beings because future housing development would be required to conduct CEQA analysis to assess for adverse effects on human beings on an individual project level. If a substantial adverse effect on human beings is found, mitigation measures would be incorporated as necessary to mitigate the adverse effects in compliance with CEQA. Based on the discussion provided, the adoption of the 2021-2029 Housing Element would have a less than significant adverse impact on human beings.

3.0 LIST OF PREPARERS

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5.0 TERMS, DEFINITIONS, AND ACRONYMS

AB	Assembly Bill
ABC	Alhambra Building Code
AMC	Alhambra Municipal Code
AQMP	air quality management plan
ARFVTP	Alternative and Renewable Fuel and Vehicle Technology Program
AUSD	Alhambra Unified School District
BMP	best management practices
BRT	bus rapid transit
CAFE	Corporate Average Fuel Economy
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CPD	Commercial Planned Development
CRHR	California Register of Historic Resources
CTC	county transportation commissions
EECAP	Energy Efficiency Climate Action Plan
GHG	greenhouse gas emissions
HCD	California Department of Housing and Community Development
HOT	high-occupancy toll
HOV	high-occupancy vehicle
HVAC	heating/ventilating/air conditioning
LEED	Leadership in Energy and Environmental Design
MPO	Metropolitan Planning Organization

NCCP	Natural Community Conser
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PPV	peak particle velocity
PRC	Public Resources Code
RHNA	Regional Housing Needs Assessment
RMS	root-mean square
ROG	reactive organic compounds
RPD	Residential Planned Development
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Los Angeles Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SCAQMD	South Coast Air Quality Management District
SGVMWD	San Gabriel Valley Municipal Water District
SoCalGas	Southern California Gas Company
SRA	Sate Responsibility Area
VMT	vehicle miles travelled