Environmental Checklist Form (Initial Study) - DRAFT

County of Los Angeles, Department of Regional Planning

Project title: "Griswold Residential" / Project No. 2020-001385 / Case Nos. Vesting Tentative Tract Map 83183 (RPPL 2020004447), Conditional Use Permit No. RPPL 2021005384, Environmental Assessment RPPL2020004450

Lead agency name and address: Los Angeles County, 320 West Temple Street, 13th Floor, Los Angeles, CA 90012

Contact Person and phone number: Lynda Hikichi, 213-974-6433

Project sponsor's name and address: MLC Holdings, Inc., 5 Peters Canyon Road, Suite 310 Irvine, CA 92606

Project location: 16209 E. San Bernardino Road, Covina, CA
APN: 8435-006-900 *USGS Quad*: Baldwin Park 7.5-minute Quadrangle

Gross Acreage: 9.61 acres (9.5 net acres)

General plan designation: Public and Semi-Public (P)

Community/Area wide Plan designation: N/A

Zoning: A-1-6000 (Light Agricultural, 6,000 square feet minimum required lot area)

Description of project:

Project Overview

The Griswold Residential project is a proposed 68-unit detached residential condominium development. The project applicant (MLC Holdings, LLC) would demolish the existing vacant buildings on the site (the Griswold School) and associated accessory structures and develop the site with 68 detached single-family residences. The proposed project would have a density of approximately 7.16 dwelling units per acre.

As shown, the proposed residential development would include single-family residences with their private driveways and outdoor areas on one common lot. All homes would have front and back lawns, and driveways accessed from the project's proposed internal, shared private driveways and fire lanes, as depicted in Figure 1, *Conceptual Site Plan*. The project would also provide two common space areas totaling 35,780 square feet with landscaping at the northern and southern portions of the site for passive recreation. In addition, designated areas would be provided adjacent to East San Bernardino Road that would be developed with an underground biofiltration basin and landscaping. A total of approximately 179 parking spaces, within garages and on-street parking within the project site, would be provided on site for the proposed residences. Figure 1, *Conceptual Site Plan* illustrates the proposed site and lot configurations.

Architectural Design

The proposed project would consist of 68 two-story, single-family homes. Each two-story home design would be a maximum of 25 feet in height and would include attached two-car garages. The residences would range in size from approximately 1,677 square feet to 2,300 square feet for the design footprints, as shown in Table 1 below. The two-story design would consist of three different floor plans; Plan 3222 that consists of a 3-bedroom, 2.5-bathroom floor plan; Plan 3625 that consists of a 5-bedroom, 3-bathroom floor plan; and Plan 3627 that consists of a 5-bedroom, 3-bathroom floor plan.

Table 1: Proposed Residential Units

Floor Plan	Units	Total Square Feet (SF)	Bedrooms	Bathrooms
Plan 3222	23	1,677 SF	3	2.5
Plan 3625	22	2,197 SF	5	3
Plan 3627	23	2,300 SF	5	3

The project includes three different elevation styles: Santa Barbara style, Coastal style, and Farmhouse style. The different elevation styles would include three color schemes, for a total of nine visually unique elevations to be interspersed throughout the development. These elevation styles include similar architectural elements, such as concrete roof tiles, stucco finishing, shutters, over hangs, and columns, as shown on Figure 6, *Elevations*.

Access and Circulation

Access to the project would be provided by a driveway from San Bernardino Road, located at the southwest corner of the project site. Seven new shared private driveways and fire lanes would be constructed to provide internal circulation, as shown on Figure 1, *Conceptual Site Plan*. These shared private driveways would include parallel parking spaces for guests. The project would provide internal sidewalks and construct a new sidewalk along the East San Bernardino Road frontage. The project would also provide public transportation access via a bus stop along San Bernardino Road, served by Foothill Transit, which would be relocated from its current location, east of the proposed driveway on San Bernardino Road.

Parking

The proposed project would include garages, driveways, and on-street parking. Each residence includes a two-car garage and provides additional driveway spaces. A total of approximately 43 on-street parking spaces, including two accessible (ADA) parking spaces, are proposed. Table 2 shows the parking to be included.

Table 2: Proposed Parking

Type of Parking	Required	Provided
Garage Spaces	2 Covered Spaces per Unit (136 spaces)	136
Guest Parking	1 Space per 4 Units (17 spaces)	**43**
Total Parking Spaces	**153**	**179**
Parking to Unit Ratio		**2.63/dwelling unit**

Recreation and Open Space

The project includes two common open space areas that would be used for passive recreation and landscaping, as shown on Figure 7, *Conceptual Landscape Plan*, Figure 8, *Conceptual Main Open Space Plan,* and Figure 9, *Conceptual Northern Open Space Plan*. The 14,821-square-foot main common open space, at the southern portion of the property, is anticipated to include a community open space area, a playground, a lawn area with bench seating, and a short-term bike rack. The community open space area would include a wood shade area, lighting, community BBQ, table and chair seating, and a fire pit. The playground would be adjacent to the community open space area and include a rubberized surface and play equipment.

A 20,959-square-foot secondary open space area would be located along the north end of the property and is designed for passive recreation and landscaping. The secondary open space area would contain a walking path, bench seating, picnic tables, and a community dog run, which would be separated from the Metrolink Green Line to the north of the site by a 6-foot-high concrete sound wall. The project would provide a total of approximately 35,780 square feet of programmed amenity area and approximately 62,443 square feet of common open space, including proposed front lawns, which would be maintained by the homeowner's association. Additionally, each home would include private back yard areas for a total of approximately 72,719 square feet of private open space within proposed backyards for each unit.

Landscaping

Landscaping proposed as part of the project would consist of drought-tolerant ornamental trees, shrubbery, and groundcover. The project would include approximately 231 new trees. Turf would be provided in the main common open space lawn area at the southern portion of the property. Landscaping would also be provided to screen above-ground utilities, including transformers. Proposed landscaping is shown on Figure 7, *Conceptual Landscape Plan.*

Walls

The project would include the removal of the existing chain-link fencing surrounding the project site and construction of freestanding, concrete block walls along the project perimeter. Along the northern property line, a concrete sound wall of approximately 6-feet in height would be constructed in order to reduce noise from the Metrolink Green Line. Approximately 6-foot-high concrete block walls would be constructed on the eastern and western property lines. Approximately 6-foot-high concrete block walls would be constructed along the yard lines of Unit Numbers 1 and 34 to limit noise from San Bernardino Road. Additional walls and fencing would be constructed within the project site, as shown on Figure 10, *Conceptual Wall and Fence Plan.*

Lighting

The project would include lighting throughout the site. Project lighting would include area pole lights and security and decorative lighting in common areas and landscaped areas.

Infrastructure Improvements

The proposed project would construct onsite infrastructure including new internal private shared driveways and individual access strips, curb, gutter, sidewalk, and storm drain improvements, wet and dry utilities, and related infrastructure improvements.

Drainage

Stormwater runoff in the project vicinity currently flows from north to south to San Bernardino Road. A series of onsite storm drain facilities with Low Impact Development (LID) and Peak Storm elements are proposed. One infiltration basin is being proposed along the southern property line. Additionally, an onsite

drainage swale is being proposed along the eastern property line to convey drainage from adjacent residences to the existing stormwater infrastructure in San Bernardino Road.

Water Infrastructure

The project would construct private domestic water lines and private fire water lines onsite to connect with existing water mains in San Bernardino Road or the project might be required to install new 8-inch water lines in East San Bernardino Road that would connect to the existing 8-inch water pipeline in Hartley Avenue. The new onsite water system would be compliant with the California Plumbing Code (Title 24) for efficient use of water.

Wastewater Infrastructure

The proposed development would install new 8-inch private sewer lines onsite that would connect to the existing 8-inch sewer pipeline in San Bernardino Road.

Construction and Phasing

Construction activities would include demolition of the existing structures, rectangular concrete pads, sheds; removal of the existing utility infrastructure; grubbing, grading, excavation, and re-compaction of soils; utility and infrastructure installation; building construction; roadway pavement; and architectural coatings. Grading is expected to result in 98,434 cubic yards of cut (with 8,068 cubic yards of rough grading, 86,434 cubic yards of over-excavation, and 3,932 cubic yards of spoils) and 98,434 cubic yards of fill (with 3,702 cubic yards of rough grading, 86,434 cubic yards of over-excavation, and 8,298 cubic yards of shrinkage). Overall, grading would balance onsite.

Construction activities are anticipated to last 21 to 27 months, with demolition, grading, and infrastructure development lasting nine (9) months and home construction lasting 12-18 months. Construction activities would be coordinated with all adjacent property owners for demolition of existing fences and construction of new walls. Project construction would occur within the hours allowed by Los Angeles County Code Title 12, Environmental Protection, Section 12.08.440, which states that construction shall occur only between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, with no construction allowed on Sundays and holidays.

General Plan and Zoning

The project is consistent with the existing Los Angeles County ("County") General Plan land use and zoning designations and no changes are proposed. The project site currently has an existing General Plan land use designation of Public and Semi-Public (P). As stated in the Land Use Element of the General Plan (2015a), "In the event that the public or semi-public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community character, are permitted". The surrounding residential uses have existing General Plan land use designations of Residential 9 (H9), which allow up to nine (9) dwelling units per acre. The proposed project proposes a density of 7.16 dwelling units per acre, and therefore it is compatible with the surrounding nine (9) dwelling units per acre density maximum allowed by the General Plan land use. The project site has a zoning designation of A-1-6,000 (Light Agricultural - 6,000 square feet minimum required lot area), which allows single-family residential development on lots that have a minimum of 6,000 square feet. The 68 single-family residences would be on a 9.5-acre multi-family lot. As such, the project would be consistent with the A-1-6000 zoning designation.

Discretionary Approvals and Permits

The discretionary actions to be considered by the County as part of the proposed project include:

- **Tentative Tract Map Approval** to create one (1) multi-family residential lot developed with 68 residential condominium units.

- **Conditional Use Permit** to allow for grading in excess of 100,000 cubic yards.

Project Location

The project site is located at 16209 East San Bernardino Road, Covina, California (APN: 8435-006-900) in the unincorporated area of Los Angeles County. The project site is directly north of the intersection of San Bernardino Road and North Woodgrove Avenue.

The project area is surrounded by Covina to the east; Baldwin Park to the west; Irwindale to the north; and West Covina to the south. As shown on Figure 2, *Regional Location*, Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately one mile to the east. Local access is provided by East San Bernardino Road, as shown in Figure 3, *Local Vicinity Map*.

Project Site

The project site consists of one 9.61-acre (9.5 net acres) parcel. As shown on Figure 5, *Existing Land Uses*, the project site is comprised of the former Griswold School, and is currently improved with six permanent structures, as well as associated improvements, such as paved recreational areas, parking lots, and patio areas. The existing buildings were constructed in 1953 for use as the Griswold School through 1974. The school was reopened in 1978 for use by Tri-Community Adult Education. The school buildings have been vacant for approximately three years and the entire property, with the exception of the parking lot along San Bernardino Road, is fenced.

The site is landscaped and includes grass/turf field areas, as well as shrubs, and mature trees. Vehicular access to the site is provided by existing driveways on East San Bernardino Road. The project site is bounded by the Metrolink railroad to the north, single-family residences to the east and west, and East San Bernardino Road to the south.

Surrounding Land Uses, General Plan and Zoning Designations

The project site is located within a developed, residential area within unincorporated Los Angeles County as described below:

North: Directly adjacent to the north of the project site is the Metrolink Railroad. Across the Metrolink Railroad to the north of the project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6000).

West: Directly adjacent to the west of the project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6000).

South: Across San Bernardino Road to the south of the project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6000).

East: Directly adjacent to the east of the project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6000).

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for

consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

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

Pursuant to the requirements of Assembly Bill 52, the County sent informational letters about the proposed project and requests for consultation to each tribe on the County's list of tribes requesting consultation on July 15, 2021. A formal notification of the proposed project was sent to the following Native American tribes and groups:

- Gabrieleno Tongva, San Gabriel Band of Mission Indians (Attn.: Anthony Morales, Chief) on July 15, 2021. Received no response.
- Gabrieleno Band of Mission Indians-Kizh Nation (Attn.: Andrew Salas, Chairman) on July 15, 2021. Received email response for consultation on October 4, 2021. Results of consultation are discussed below.
- The Local Government Tribal Consultation List Request was sent to the Native American Heritage Commission on July 22, 2021. A response dated August 19, 2021 was received via email and stated the following, "A search of the SFL (Sacred Lands File) was completed for the project with negative results."
- A request for the Project Review/Quick Check was submitted to the South Central Coastal Information Center (California State University, Fullerton-Department of Anthropology). The results of the Project Review/Quick Check was received on February 26, 2020.

During the notification period, the Gabrieleno Band of Mission Indians-Kizh Nation responded and requested consultation with the County. Consultation with the Kizh Nation occurred in November 2021. The tribe identified potential tribal cultural resources and provided recommended mitigation measures that are included within this Initial Study.

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

Public Agency	*Approval Required*
Department of Public Work-Building & Safety	Building, Grading, and Demolition Permits

Major projects in the area:

Project/Case No.	*Address*	*Description*	*Status*
R2014-01018/TR072718	16050 E San Bernardino Rd, Covina, CA 91722	22 detached single-family residences.	Approved at Regional Planning Commission ("RPC"), May 20, 2015
PM062516	Southeast corner of Badillo Street and N Sunset Avenue	4 single-family residences.	Approved at RPC, June 4, 2008
TR065943	4739 Vincent Avenue, Irwindale, CA 91706	8 detached condominiums	Approved at Hearing Officer, September 16, 2008

Reviewing Agencies:

Responsible Agencies

- ☐ None
- Regional Water Quality Control Board:
  - ☒ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ LAFCO

Special Reviewing Agencies

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area
- ☐

Regional Significance

- ☒ None
- ☐ SCAG Criteria
- ☐ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns. Area
- ☐

Trustee Agencies

- ☐ None
- ☒ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

County Reviewing Agencies

- ☒ DPW
- ☒ Fire Department
  - Forestry, Environmental Division
  - Planning Division
  - Land Development Unit
  - Health Hazmat
- ☒ Sanitation District
- ☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☒ Sheriff Department
- ☒ Parks and Recreation
- ☒ Subdivision Committee

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

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

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

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

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

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

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

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

Lynda Hikichi — Signature (Prepared by)

1-31-2022 — Date

Signature (Approved by)

1-31-2022 — Date

1. AESTHETICS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Less than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. A scenic vista can be impacted in two (2) ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether the proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

As discussed in the Conservation and Natural Resources Element (2015c) of the County's General Plan, the San Gabriel Mountains, Verdugo Hills, Santa Susana Mountains, Simi Hills, Santa Monica Mountains and Puente Hills play a major role in physically defining the topographically and aesthetically diverse communities in the project area. These landforms not only create dramatic backdrops against developed communities, but also provide extensive environmental and public benefits to residents. However, while the existing General Plan recognizes the importance of scenic resources in the project area, there are no specific views or corridors that are identified for conservation purposes.

The project site is located within an urbanized residential area of unincorporated Los Angeles County. The project site includes 9.61 acres (9.5 net acres) currently zoned for A-1-6,000, Light Agriculture with 6,000 square feet lot minimums. The project would have a density of approximately 7.16 dwelling units per acre, which would be consistent with the surrounding residential densities that are designated for H9 (nine dwelling units per net acre). The project proposes the construction of 68 single-family residences, common areas, private driveways and fire lanes, landscaping, stormwater infrastructure, and offsite service connections, which are consistent with the site's current zoning designation. The surrounding area is developed with residential buildings that are similar in height, size, and scale to the proposed residential development as shown on Figure 4, *Aerial View*.

The project's lot size would be compliant with zoning since the project proposes one common multi-family lot of 9.61 acres, and impacts, if any, on scenic vistas would be minimal given the considerable distance of the project site to scenic features, as well as the fact that these views are already affected by the existing built environment on site and in the surrounding area. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista and impacts to scenic vistas would be less than significant and this topic will not be further analyzed in the Environmental Impact Report (EIR).

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	☐	☐	☐	☒

No Impact. The project site is located within a fully developed urban area and is not located in the vicinity of a County regional riding or hiking trail. However, the Santa Fe Dam Loop Trail is located approximately one (1) mile northwest of the project site. The Santa Fe Dam Loop Trail is not located in the vicinity of the project site and does not have direct or indirect views of the project site. Thus, the proposed project would not result

in impacts related to regional riding or hiking trails and scenic views and this topic will not be further analyzed in the EIR.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

No Impact. The proposed project is not located within view of a state scenic highway, as there are no designated scenic highways within the vicinity. The nearest state-designated scenic highway is California State Route 2, approximately 11 miles from the proposed project (Caltrans 2020). The nearest eligible scenic highway is Highway 39, approximately 3.5 miles from the project site. The proposed project would not result in impacts to trees, rock outcroppings, or historic buildings within a state scenic highway. Therefore, no impacts to scenic resources within a state scenic highway would occur and this topic will not be further analyzed in the EIR.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)	☐	☐	☒	☐

Less than Significant Impact. As described previously, the project site is located within an urbanized area and is surrounded by a roadway, a rail line, and single-family residential neighborhoods. The existing character of the project site and surrounding area is neither unique nor of special aesthetic value or quality. The proposed residential development would replace the existing vacant school and would develop 68 single-family residences, open space areas, and private driveways and fire lanes on the project site.

General Plan. The project site is designated as P (Public and Semi-Public) within the General Plan. Per the General Plan, the purpose of the Public and Semi-Public land use designation is to develop public and semi-public facilities and community-serving uses, including public buildings and campuses, schools, hospitals, cemeteries, and fairgrounds; airports and other major transportation facilities. However, "in the event that the public or semi-public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community characters, are permitted". (LA County, 2015a). The surrounding areas are designated as Residential 9 (H9), which allows for single-family residences at a density of up to nine dwelling units per net acre. The proposed project would have a density of approximately 7.16 dwelling units per acre, which is consistent and compatible with the surrounding residential densities. Thus, the project would not conflict with applicable General Plan buildout densities that govern scenic quality. In addition, the project would be consistent with the General Plan Conservation and Natural Resource Element goals and policies related to scenic quality, as shown in Table AES-1.

Table AES-1: Consistency with Conservation and Natural Resources Element Goals and Policies Related to Scenic Quality

Goal or Policy	Project Consistency
Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.	**Consistent.** The Public and Semi-Public land use designation allows for residential developments when the use of public facilities is terminated, as long

	as the proposed residential development is consistent with surrounding development. The areas surrounding the proposed project site area all designated as H9, which allows for densities of up to 9 du/acre. The proposed project will have a density of approximately 7.08 du/acre. Therefore, the proposed project is consistent with land use regulations governing density in order to mitigate development impacts.
Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.	**Consistent.** The project site is located in an urban area in unincorporated LA County, near the City of Covina. The project site is not located on a ridgeline; therefore, implementation of the project would not impact ridgelines.
Policy C/NR 13.3: Reduce light trespass, light pollution and other threats to scenic resources	**Consistent.** The project would comply with the County Green Building Code, as adopted in the Los Angeles County Code Title 31. As such, the project would comply with regulations regarding exterior lighting in order to reduce light pollution from the project. The project is not located in a Rural Outdoor Lighting District per Title 22, Chapter 22, Section 80, and therefore, would not be required to implement further dark skies measures.
Policy C/NR 13.4: Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.	**Consistent.** There is currently no natural terrain or vegetation on the project site as it is developed with ornamental landscaping. The project would incorporate the use of California native and drought tolerant plants in landscaping in order to improve site conditions in relation to the natural vegetation found throughout the County.
Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain	**Consistent.** The project site is relatively flat with a gentle slope to the south. Therefore, there are no significant terrain features and project grading will be compatible with the existing terrain.
Policy C/NR 13.6: Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.	**Consistent.** The project site is not located along any scenic routes, corridors, waterways, or in other scenic areas.
Policy C/NR 13.7: Encourage the incorporation of roadside rest stops, vista points, and interpretive displays into projects in scenic areas.	**Consistent.** The project site is located in a highly urbanized area in unincorporated LA County, near the City of Covina. The project's frontage along East San Bernardino Road does not feature any significant scenic vistas as the project site is developed with a school, and the surrounding areas are developed with single-family residences. Therefore, the project would not need to encourage the incorporation of roadside rest stops, vista points, and interpretive displays into development as it is not in a scenic area.
Policy C/NR 13.8: Manage development in HMAs (Hillside Management Areas) to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.	**Consistent.** The project site is located in an urban area in unincorporated LA County, near the City of Covina. The project site is not located in a hillside management area; therefore, the project would not need to comply with standards or requirements set for hillside management areas.

In addition, as part of the project entitlement process, the County conducts a review of all building and site plans. The purpose of this review is to ensure that the design of a proposed development is consistent with all applicable requirements, standards, and regulations set forth by the County Code, as well as other relevant local, State, and federal regulations.

Zoning. The project site is currently zoned A-1-6,000 (Light Agriculture with 6,000 sq. ft. lot minimum). The project would be consistent with the 6,000 square feet lot minimums as the project would consist of one common lot encompassing the entire 9.61-acre parcel. As shown in the project plans incorporated herein, the proposed project would be consistent with the setbacks, maximum height requirements, and all additional development standards outlined in Section 22.140.580 (Single-Family Residences) of the Los Angeles County Zoning Code, as shown in Table AES-2, below.

Table AES-2: Project Consistency with Development Standards

Development Standard	Required (A-1-6000)	Proposed
Parking	2 covered spaces per unit, 1 guest space per every 4 units (153 Spaces Total)	179 Spaces
Front Setback	20 ft	20 ft
Rear Setback	15 ft	15 ft
Side-Yard Setback	5 ft	5 ft
Building Height	35 ft	24 ft – 8 in
Minimum Lot Size	6,000 square feet	One multi-family lot with 9.5 net acres

Thus, the project would not conflict with applicable zoning and other regulations governing scenic quality. As the project applicant would develop the site with single-family housing, which is consistent with the land uses adjacent to the site, the project would be visually compatible with the surrounding single-family uses. Hence, the proposed project would not degrade the visual character of the project site and surrounding area. Impacts would be less than significant and will not be further analyzed in the EIR.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

Less Than Significant Impact. Spill light occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Sensitive uses (e.g., residential uses) surrounding the project site could be impacted by the light from development within the boundaries of the project site if light spill occurs.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of off-site locations but results in a visible source of light viewable from a distance. Glare could also occur from building materials of the new structures, including glass and other reflective materials.

The project site is currently developed with six permanent buildings: three classroom buildings, an administration building, a cafeteria, and a library. The proposed project would introduce additional sources of light from new building security lighting, streetlights, interior lights shining through building windows, and

headlights from nighttime vehicular trips generated from the project. However, the project would only slightly increase lighting and glare compared to the existing condition and new landscaping would be provided throughout the project site that would limit impacts from new sources of light and glare. Landscaping, including trees, would limit spill of light to adjacent properties. Also, as a standard condition of project approval, the proposed project would be required to comply with lighting standards detailed in the County's Code, which would require project lighting to be shielded, diffused or indirect to avoid glare to both on and offsite residents, pedestrians, and motorists. Therefore, impacts associated with new lighting would be less than significant and will not be further analyzed in the EIR.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

2. AGRICULTURE / FOREST

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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

No Impact. The project site is currently developed with school buildings and located in an urbanized area of unincorporated Los Angeles County that is predominantly developed with educational, commercial, and residential uses. The project site has a zoning designation of Light Agriculture (A-1-6000). The project site is developed and was previously used for a school. The site is not designated as Prime, Unique, or Farmland of Statewide Importance (Farmland Mapping and Monitoring Program, 2021). Therefore, the proposed project would not have impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and impacts related to farmland will not be further analyzed in the EIR.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	☐	☐	☒	☐

Less than Significant Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments.

The project site is currently zoned Light Agriculture (A-1-6000). According to Chapter 22.16 of Los Angeles County Zoning Code, Agricultural Zones (Zones A-1 and A-2) allows for single-family residential development, outdoor recreational uses, and public and institutional facilities. The existing zoning of the project site would remain in place, and the single-family residential project would be consistent with the Light Agriculture (A-1-6000) zoning of the project site. Therefore, the proposed project would not conflict with the existing agricultural zoning. Thus, impacts would be less than significant and will not be further analyzed in the EIR.

Additionally, the project site is not under an active Williamson Act contract. Therefore, development of the project would not result in the cancellation of the contract, and impacts related to a Williamson Act contract would not occur and will not be further analyzed in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code §51104(g))? ☐ ☐ ☐ ☒

No Impact. The site is currently improved with six permanent structures, as well as associated improvements, such as paved recreational areas, parking lots, and patio areas. The site does not contain forest land and there are no forestland resources in the vicinity of the project site. It is not designated or zoned as forest land or timberland, or for timberland production. As a result, the proposed project would not result in impacts on timberland resources and will not be further analyzed in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

No Impact. As discussed previously, there are no forest or timberland resources on or in the vicinity of the project site. The proposed project would not convert forest land to a non-forest use. Therefore, there would be no impacts related to the loss of forest land or the conversion of forest land to non-forest uses.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

No Impact. Although zoned as Light Agriculture (A-1-6000), the site is developed and is not used for agricultural purposes. The site is not designated or zoned for forest land. The proposed project would not convert farmland to a nonagricultural use or convert forest land to a non-forest use. Therefore, no impacts would occur, and the project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Existing Plans, Programs, or Policies
None.

Mitigation Measures
None.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

Less Than Significant Impact. The project site is located in the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a proposed project would result in growth that is substantially greater than what was anticipated, then the proposed project would conflict with the AQMP per Consistency Criterion No. 1. On the other hand, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation per Consistency Criterion No. 2.

Furthermore, SCAB is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed project, could cumulatively contribute to these pollutant violations. Should construction or operation of the proposed project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The proposed 68 single-family residences would result in a population of approximately 204 residents. The Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy's (2020-2045 RTP/SCS) population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,500 additional persons, yielding an approximately 20.4% growth rate. The unincorporated areas of Los Angeles are projected to have a population of 1,258,000 persons and 419,300 housing units by 2045. The proposed project would generate approximately 204 persons, which represents approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. Additionally, the project would be consistent with the existing zoning. Therefore, the proposed increase in housing units and population as a result of the proposed project is within SCAG's 2020-2045 RTP/SCS growth forecast.

The proposed project would support AQMP objectives to promote infill/redevelopment and balance jobs and housing for Los Angeles County, and would not conflict with implementation of the AQMP. As a result, the proposed project would comply with Consistency Criterion No. 1 listed above.

As detailed below in Impact 3b and 3c, operation of the proposed project would not exceed the thresholds of significance. Therefore, the proposed project would result in an impact related to Consistency Criterion No. 2 of the AQMP. As a result, impacts related to consistency with the AQMP would be less than significant, and this topic will not be further evaluated in the EIR.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

Less Than Significant Impact. SCAB is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed project, could cumulatively contribute to these pollutant violations. Evaluation of cumulative air quality impacts of the proposed project has been completed pursuant to SCAQMD's cumulative air quality impact methodology, SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors from emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. The methodologies from the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook are used in evaluating project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3

Construction

Construction activities associated with the proposed project would generate pollutant emissions from the following: (1) demolition of the existing structures and removal of the existing infrastructure and pavement, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coating. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling and is included as Plan, Program, or Policy (PPP) AQ-1. In addition, implementation of SCAQMD Rule 1113, which governs the VOC content in architectural coating, paint, thinners, and solvents was accounted for in construction emissions modeling, and is included as PPP AQ-2. As shown in Table AQ-2, CalEEMod results indicate that construction emissions generated by the proposed project would not exceed SCAQMD regional thresholds with implementation of PPP AQ-1 and PPP AQ-2. Therefore, construction activities would result in a less than significant impact, and this topic will not be analyzed in the EIR.

Table AQ-2: Maximum Peak Construction Emissions

	Emissions (lbs/day)					
Construction Activity and Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition 2021	3.41	37.05	23.51	0.06	3.88	1.87
Site Preparation 2021	3.99	41.14	22.03	0.04	10.42	6.42
Grading 2021	2.38	25.42	16.63	0.03	4.32	2.64
Building Construction 2021	2.40	20.61	20.51	0.05	2.10	1.22
Building Construction, Paving, and Architectural Coatings 2022	51.42	31.25	37.79	0.07	2.96	1.78
Maximum Daily Emissions	**51.42**	**41.14**	**37.79**	**0.07**	**10.42**	**6.42**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Vista Environmental, 2021.

Operation

Implementation of the proposed project would result in long-term emissions of criteria air pollutants from area sources generated by the proposed residential uses, such as vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products. The emissions from the proposed project are primarily from vehicle trips. As described in Section 17, *Transportation*, the proposed project is anticipated to generate 670 daily trips, with 53 a.m. peak hour trips and 70 p.m. peak hour trips. The operational emissions from the project are provided on Table 5.1-8. Detailed operation model outputs are provided in Appendix A (Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis). As shown in Table AQ-3, emissions from operation of the proposed project would not exceed the thresholds of significance. Therefore, operational emissions would be less than significant, and this topic will not be further evaluated in the EIR.

Table AQ-3: Summary of Operational Emissions

	Emissions (lbs/day)					
Operational Activities	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	3.39	0.08	5.87	0.00	0.03	0.03
Energy Source	0.05	0.44	0.19	0.00	0.04	0.04
Mobile Sources	1.03	4.22	12.47	0.05	3.83	1.05
Total Project Daily Emissions	**4.46**	**4.74**	**18.52**	**0.05**	**3.90**	**1.12**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Vista Environmental, 2021.

c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

Less than Significant Impact.

Construction

The daily construction emissions generated onsite by the proposed project are evaluated against SCAQMD's Localized Significance Thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The closest sensitive receptors to the project are located adjacent to the east and west sides of the project site. The SCAQMD LST Methodology states that projects with boundaries located closer than 25 meters (82 feet) to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, the LSTs for a receptor distance of 25 meters is used to evaluate LST emissions. Table AQ-4 identifies daily localized onsite emissions that are estimated to occur during construction of the proposed project. As shown in Table AQ-4, emissions during the peak construction activity would not exceed any of the SCAQMD's localized significance thresholds. Therefore, LST impacts would be less than significant.

Table AQ-4: Summary of Localized Construction Emissions

	Emissions (lbs/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Construction Phases				
Demolition	32.14	21.81	3.41	1.73
Site Preparation	40.58	21.26	10.20	6.36
Grading	24.82	15.95	4.13	2.59
Building Construction (Year 2021)	17.83	17.07	1.10	0.94
Combined Building Construction (2022), Paving and Architectural Coatings	28.53	33.38	1.64	1.42
Maximum Daily Construction Emissions	**40.58**	**33.38**	**10.20**	**6.36**
SCAQMD Localized Threshold	**203**	**1,733**	**14**	**8**
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: Vista Environmental, 2021.

CO Hotspots

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

According to the SCAQMD Air Quality Data Tables, in 2007 East San Gabriel Valley had maximum CO concentrations of 3.0 ppm for one (1) hour and 1.8 ppm for eight (8) hours and in 2019 East San Gabriel Valley had maximum CO concentrations of 1.6 ppm for one (1) hour and 1.1 ppm for eight (8) hours, which represent decreases in CO concentrations of 47 percent and 39 percent, respectively between 2019 and 2007. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. (The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard.

The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with Levels of Service (LOS) E in the morning and LOS F in the evening peak hour) (Vista Environmental 2021).

Since the nearby intersections to the proposed project are much smaller with less traffic than what was analyzed by the SCAQMD and since the CO concentrations are now at least 39 percent lower than when CO was designated "Attainment" in 2007, no local CO Hotspots are anticipated to be created from the proposed project and no CO Hotspot modeling was performed. Therefore, impacts related to CO hotspots generated from the proposed project would be less than significant. This topic will not be further evaluated in the EIR.

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

Less than Significant Impact. The proposed project does not include heavy industrial, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, or other land uses that typically result in emissions associated with odor complaints, based on the SCAQMD CEQA Air Quality Handbook. Potential emissions that may lead to odors during construction activities include equipment exhaust. Additionally, construction activities may lead to odors from painting activities. However, these emissions and any associated odors would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Therefore, development pursuant to the proposed project would not result in any substantial impacts related to odor, and impacts would be less than significant. This topic will not be further evaluated in the EIR.

Existing Plans, Programs, or Policies

PPP AQ-1: SCAQMD Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 403:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: SCAQMD Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 1113. The project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.

PPP AQ-3: SCAQMD Rule 445. The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.

Mitigation Measures

None.

4. BIOLOGICAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. As described in the Biological Constraints Analysis included as Appendix B, a literature review and field survey were conducted on the project site and surrounding area. The literature review and field survey found that no native vegetation exists on the project site, and no candidate, sensitive, or special status wildlife species have the potential to occur onsite. According to the literature review, a total of 20 sensitive wildlife species and 11 sensitive plant species have the potential to occur, or have historically occurred, in the project vicinity. These include those species listed or candidates for listing by the U. S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) or as rare by the California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the field survey for their presence or potential presence.

As described in the Biological Constraints Analysis, included as Appendix B, none of the protected plant species with the potential to occur in the project vicinity occur onsite or have the potential to occur onsite due to an absence of suitable growing conditions. As described in the Biological Constraints Analysis, none of the protected wildlife species that have the potential to occur in the project vicinity occur onsite due to an absence of suitable habitat (Appendix B).

The existing trees on the site have the potential to provide habitat for nesting migratory birds. Many of these trees would be removed during construction. Therefore, the proposed project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA and California Fish and Game Code, could result in a potentially significant impact if requirements of the MBTA and California Fish and Game Code are not followed. Therefore, implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 would ensure compliance with federal and State regulations and would require a roosting bat and nesting bird survey to be conducted prior to the commencement of construction during roosting and nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level. This topic will not be discussed in the EIR.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional	☐	☐	☐	☒

wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

No Impact. According to the Biological Constraints Analysis, the project site does not contain riparian habitat (Montijo 2020). There are no riparian habitat or other sensitive natural communities as identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Montijo 2020). Therefore, no impact would occur, and this topic will not be further discussed in the EIR.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☐ ☒

No Impact. The project site does not contain state or federally protected wetlands (Montijo 2020). In addition, the project site does not contain any jurisdictional areas that would be subject to Section 404 of the Clean Water Act, and the proposed project does not involve any hydrological interruption on any existing water resources. Therefore, the redevelopment of the project site would not result in impacts to wetlands, and this topic will not be discussed in the EIR.

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 with Mitigation The project site does not contain, or is not adjacent to, any wildlife corridors. The project site is surrounded by roadways and developed areas. Areas of residential, commercial, and additional roadways are located beyond the roadways adjacent to the site. Development of the site would not result in impacts related to established native resident or migratory wildlife corridor.

Native wildlife nursery sites include active bird nests and bat roosts. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish and Game Code Section 4150, California Code of Regulations (CCR), Section 251.1). Several bat species are also considered California Species of Special Concern (CSC) and meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines 15065). Take of CSC could require a mandatory finding of significance by the Lead Agency, (CEQA Guidelines 15065). Birds may nest on site on the ground or within tree and shrub cover. Bats may roost within juniper trees. Implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 will reduce potential impacts to nesting birds and roosting and migratory bats to less than significant. This topic will not be included in the EIR.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or ☐ ☐ ☐ ☒

other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

No Impact. The few trees existing on the project site are not native. No oak woodlands or other unique native trees exist within the project site. To verify the presence of oak trees on the project site, a biological survey, included in the Biological Constraints Analysis, was conducted on February 20, 2020. The results of the survey indicated that no protected oak trees were identified either on the site or within 50 feet of the property boundaries. As a result, impacts to oak woodlands or unique native trees would not occur with implementation of the proposed project. As such, this topic will not be further evaluated in the EIR.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)? ☐ ☐ ☐ ☒

No Impact. Chapter 22.174 of the County's Code regulates oak tree permits. As discussed in the County Code, the intent of an Oak Tree Permit is to maintain and enhance the general health, safety, and welfare of oak trees, which assist in counteracting air pollution, minimizing soil erosion, and other related environmental damage. The Oak Tree Permit is also intended to preserve and enhance property by conserving and adding to the distinctive and unique aesthetic character of many areas of the County in which oak trees are indigenous. The stated objective of the Oak Tree Permit is to preserve and maintain healthy oak trees in the development process.

To verify the presence or lack of oak trees on the project site, a biological survey was conducted, provided as Appendix C, on February 20, 2020 (Montijo 2020). The results of the survey indicated that no protected oak trees were identified either on the site or within 50 feet of the property boundaries. Therefore, the proposed project would not impact the County's oak tree ordinance.

Overall, the proposed project would include the removal of ornamental trees and shrubs within the project site. However, none of the existing trees and shrubs on site have been determined to be significant biological resources. Furthermore, the project site is not located in a Wildflower Reserve Area, Significant Ecological Area, Specific Plan, Community Standards District, or Coastal Resource Area. Implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources (e.g., a tree preservation policy or ordinance). Therefore, no impacts would occur with implementation of the proposed project. Impacts related to local policies or ordinances will not be further evaluated in the EIR.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan? ☐ ☐ ☐ ☒

No Impact. The project site and immediately surrounding areas are not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan (CDFW 2020). As such,

implementation of the proposed project would have no potential to conflict with a conservation plan. Therefore, the project would not conflict with any conservation plan, no impact would occur, and this topic will not be further evaluated in the EIR.

Plans, Programs, and Policies
None.

Mitigation Measures
Mitigation Measure BIO-1: Special-Status Roosting Bats. To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in tree cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:

a) To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
b) If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified bat specialist shall conduct a pre-construction survey to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
c) Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified bat specialist no greater than seven (7) days prior to tree disturbance or structure removal to more precisely determine the presence or absence of roosting bats.
d) If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees or structures in a controlled manner using heavy machinery. In order to ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a bat specialist. Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawn up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
e) Maternity season lasts from March 1 to September 30. Trees or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A structure containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.
f) The bat specialist shall document all demolition monitoring activities and prepare a summary report to the County upon completion of tree disturbance or building demolition activities. If Townsend's big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.

Mitigation Measure BIO-2: Bat Relocation. If confirmed occupied or formerly occupied bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality shall be constructed and maintained at a suitable undisturbed area. The design and location of the artificial bat roosts shall be determined by the bat specialist in consultation with CDFW.

a) In exceptional circumstances, such as when roosts cannot be avoided and bats cannot be evicted by non-invasive means, it may be necessary to capture and transfer the bats to appropriate natural or

artificial bat roosting habitat in the surrounding area. Bats raising young or hibernating shall not be captured and relocated. Capture and relocation shall be performed by the bat specialist in coordination with CDFW, and shall be subject to approval by Los Angeles County Department of Regional Planning (DRP) and CDFW.

b) A monitoring plan shall be prepared for the replacement roosts, which shall include performance standards for the use of the replacement roosts by the displaced species, as well as provisions to prevent harassment, predation, and disease of relocated bats.
c) Annual reports detailing the success of roost replacement and bat relocation shall be prepared and submitted to Los Angeles County Department of Regional Planning and CDFW for five (5) years following relocation or until performance standards are met, whichever period is longer.

Mitigation Measure BIO-3: Nesting Birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, which generally runs from February 1 – August 31 (as early as January 1 for some raptors), to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.

5. CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	☐	☐	☒	☐

Less than Significant. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria:

1) Listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR);
2) Listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
3) Identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
4) Determined to be a historical resource by the project's Lead Agency.

PRC Section 5024.1 directs evaluation of historical resources to determine their eligibility for listing on the CRHR. The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing on the National Register of Historic Places (NRHP), enumerated above, and require similar protection to what National Historic Preservation Act (NHPA) Section 106 mandates for historic properties. According to PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it meets at least one of the following criteria:

1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
2) Associated with the lives of persons important to local, California or national history;
3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

As described previously, the project site is currently developed with the vacant Griswold Elementary School. The project site was used as an elementary school between 1953 and 1974. It was later used as an adult school between 1978 and 2017. The Historical Resource Evaluation Report for the project describes that the school was one of 25 original schools designed by architect Henry L. Gogerty for the Covina-Valley Unified School District.

The Griswold School is an example of a Mid-Century Modern school building. It was not the first of its kind and does not appear to have been instrumental in inciting or pioneering the Mid-Century Modern movement within the County of Los Angeles or the Covina-Valley Unified School District. As such, the Griswold School has not been found eligible under NRHP Criterion A or CRHR Criterion 1 as the property has not been associated with significant events or patterns of events in national, state, regional, or local history (GPA 2020).

The Griswold School was named after May Evangeline Griswold (Dec. 28, 1875-Dec. 1967). Griswold's family were pioneers of the area and she was a long-time schoolteacher. May Evangeline Griswold's potential

importance is not directly associated with the Griswold School. It has not been found individually eligible under NRHP Criterion B or CRHR Criterion 2 as it has not been identified as having an association with an important person (GPA 2020).

The Griswold School campus possesses characteristics of the Mid-Century Modern style, but it is a typical example of postwar school construction conducted on a large scale using similar stylistic features and materials throughout the region. The commonly seen combination of design details and materials of this campus does not exemplify the distinctive characteristics of a type, period, or method of construction, because it is not an important example of building practices from a particular time in history. Schools of similar design and form are extant throughout Southern California and research did not reveal any reason to suggest that this campus had an impact on this type of construction, nor does it represent an evolution or transition. The architect Henry L. Gogerty designed the school campus and the individual buildings. Gogerty was hired by the school district to design a number of campuses after World War II. Gogerty designed approximately 25 projects for the Covina-Valley Unified School District, as well as many others including approximately 20 projects for the Compton Unified School District. While Gogerty is undoubtedly considered a master architect, the Griswold School campus is not considered an important representation of his extensive portfolio of work. Within the Covina-Valley Union School District alone, it is one of many similar campus designs Gogerty completed. For these reasons, the Griswold School does not appear to be individually eligible under NRHP Criterion C or CRHR Criterion 3 (GPA 2020).

The Griswold School was constructed in 1953 on previously undeveloped agricultural land. Without evidence to indicate otherwise, the school has not been found eligible under NRHP Criterion D or CRHR Criterion 4 as further study of the property would not appear to yield information which would be considered important in local, regional, state, or national history. Therefore, the existing school facility does not meet any of the historic resource criteria and does not meet the definition of an historical resource pursuant to CEQA. Thus, impacts related to historic resources would be less than significant and will not be discussed further in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. The ground surface within the project site has long been used for urban development. The project site was used for a citrus grove until the early-1950s when school buildings were developed on the site. Thus, the site has been previously disturbed from both agricultural uses and development, including ground disturbance to depths for installation of the existing utility infrastructure that serves the site. A records search for the project site was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) that included California Points of Historical Interest (PHI), California Historical Landmarks (CHL), the CRHR, the NRHP, the California State Historic Resources Inventory (HRI), and historic topographic maps. The records search conducted for the proposed project identified that two archaeological resources (P-19-187085 and P-19-187977) are located within one-half mile of the project site. The closest resource (P-19-187065) to the project is located approximately 0.4 mile southwest of the site. This resource is the potential location or vicinity of the Mojave Road, which according to historical documentation, existed in between Fort Drum in Wilmington, California, and Fort Mojave, Arizona. In addition, the Cultural Resources Survey determined that due to the absence of any previously recorded archaeological resources with physical remains within one-half mile of the project site, the area has a moderate to low level of sensitivity for archaeological resources (FCS 2021).

Construction activities within the project site would include removal of the existing infrastructure and landscaping; grading and excavation; and installation of the new drainage and utility infrastructure. The grading and excavation process would remove and recompact the loose alluvium that currently underlies the upper three (3) feet of soil. As the project site has a low to moderate level of sensitivity for archaeological resources and the site has been previously disturbed, the Cultural Resources Assessment (Appendix C) determined that Mitigation Measure CUL-1 should be included to require retention of an archaeologist for monitoring during initial grubbing and scraping and provide spot check throughout project ground disturbing activities. With implementation of Mitigation Measure CUL-1, impacts would be less than significant, and this topic will not be evaluated in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. The project site is mapped as being underlain by surficial sediments of alluvial gravel, sand, and silt (Qa). A records search conducted with the University of California Museum of Paleontology identified that the closest previously discovered fossil locality is 2.5 miles away from the project site within the Miocene Puente Formation, and that the area has a low level of sensitivity for paleontological resources (Finger 2020). Additionally, previous onsite ground disturbances have further reduced the potential of the site to contain paleontological resources.

Construction of the project includes excavation of approximately three (3) feet of loose alluvium that would be replaced as compacted fill. The Paleontological Resource Survey determined that shallow excavation (≤15 feet) in the project site is unlikely to impact paleontological resources. However, in the event paleontological resources are incidentally discovered during the construction process, Mitigation Measure CUL-2 is included to require retention of a paleontological resource specialist to evaluate the incidental discovery. With implementation of Mitigation Measure CUL-2, impacts to paleontological resources would be less than significant, and this topic will not be evaluated in the EIR

d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. The project site does not contain a cemetery, and no known formal cemeteries are located within the immediate vicinity of the project site. Nevertheless, should human remains be unearthed during grading and excavation activities associated with project development, the construction contractor would be required by California law to comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment

and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

There is no record of human remains on the project site. In the event that human remains are encountered on the project site, the project applicant would be required to halt all development activities and comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 and contact the Los Angeles County Coroner. If it is determined that the human remains are of Native American descent, the Native American Heritage Commission should be contacted, who will in turn contact the likely descendants. They will be informed of the encounter and in consultation with the property owner, a decision will be made on how to proceed. Only after this decision and all necessary actions occur can development activities recommence. Through mandatory compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, included as Mitigation Measure CUL-3, any potential impacts to disturbing human remains, including remains of Native American ancestry, would be less than significant. This topic will not be further evaluated in the EIR.

Plans, Programs, and Policies
None.

Mitigation Measures

Mitigation Measure CUL-1: Archaeological Monitoring. Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified archaeologist has been retained, from a qualified professional archeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A stating that the archeologists have been retained and will be present at pre-grade meetings and for all initial ground disturbing activities. The archaeologist shall provide spot check monitoring as determined necessary by the retained archaeologist.

In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find would need to occur.

In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the County shall be immediately notified. The archeologist shall be contacted to flag the area in the field and shall determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)).

If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological

resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the developer/applicant's expense.

Mitigation Measure CUL-2: Paleontological Incidental Discoveries. Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified paleontologist has been retained and either the paleontologist, or a representative, shall be onsite if excavations penetrate the bedrock formations.

In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The project applicant shall then inform the Los Angeles County Natural History Museum of the find and retain a qualified paleontologist. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Criteria for discard of specific fossil specimens will be made explicit by the qualified paleontologist. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

Mitigation Measure CUL-3: **Human Remains.** If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98).

6. ENERGY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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?	☐	☐	☒	☐

Less than Significant Impact.
Construction.

During construction of the proposed project energy would be consumed in three (3) general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the proposed project would not result in demand for fuel greater on a per-unit-of-development basis than other development projects in southern California. Demolition of the existing buildings and infrastructure that exist onsite would need to be undertaken; however, because much of the demolition materials can be recycled, the demolition needed to implement the proposed project is not considered to be wasteful. Construction would occur in three phases over a 21 to 27-month period and the demand for construction-related electricity and fuels would be limited to that time frame.

Also, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Additionally, construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. The project's construction electricity usage over the 21 to 27-month construction period would be consistent with projects of similar size and would utilize electricity for needed lighting but would not result in wasteful use.

In addition, as shown in Table E-1, construction of the proposed project is estimated to result in the need for 40,889 gallons of diesel fuel.

Table E-1 Estimated Construction Fuel Consumption

Activity/ Duration	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption (gal. diesel fuel)
Demolition	Concrete/Industrial Saws	81	1	8	0.73	160	543
	Excavators	158	3	8	0.38	480	1,488
	Rubber Tired Dozers	247	2	8	0.40	320	1,632
Site Preparation	Rubber Tired Dozers	247	3	8	0.40	240	1,224
	Tractors/Loaders/Backhoes	97	4	8	0.37	320	659
Grading	Excavator	158	1	8	0.38	160	496
	Grader	187	1	8	0.41	160	633
	Rubber Tired Dozer	247	1	8	0.40	160	816
	Tractors/Loaders/Backhoes	97	3	8	0.37	480	989
Building Construction	Crane	231	1	7	0.29	1,620	5,568
	Forklifts	89	3	8	0.20	5,520	5,639
	Generator Set	84	1	8	0.74	1,840	6,564
	Tractor/Loader/Backhoes	97	3	7	0.37	4,830	9,949
	Welder	46	1	8	0.45	1,840	2,186
Paving	Paver	130	2	8	0.42	320	902
	Paving Equipment	132	2	8	0.36	320	785
	Rollers	80	2	8	0.38	320	558
Architectural Coating	Air Compressor	78	1	6	0.48	120	258
Total Off-Road Equipment Fuel Used During Construction (gallons)							***40,889***

Source: Vista Environmental, 2021

Table E-2 shows that construction workers would use approximately 12,074 gallons of fuel to travel to and from the project site. Tables E-3 and E-4 show that approximately 6,234 gallons of fuel would be used by medium and heavy-duty trucks, and 933 gallons of fuel would be used for hauling by heavy duty trucks during construction of the proposed project.

Table E-2: Estimated Construction Worker Fuel Consumption

Construction Activity	Worker Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Demolition (20 days)	15	14.7	4,410	25.3	175
Site Preparation (10 days)	18	14.7	2,646	25.3	105
Grading (20 days)	15	14.7	4,410	25.3	175
Building Construction (230 days)	84	14.7	284,004	25.3	11,246
Paving (20 days)	15	14.7	4,410	25.3	175
Architectural Coating (20 days)	17	14.7	4,998	25.3	198
Total Construction Worker Fuel Consumption					***12,074***

Source: Vista Environmental, 2021

Table E-3: Estimated Construction Vendor Fuel Consumption (Medium High Duty Trucks)

Construction Activity	Vendor Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Demolition (20 days)	6	6.9	41	8.0	104
Site Preparation (10 days)	6	6.9	41	8.0	52
Grading (20 days)	6	6.9	41	8.0	104
Building Construction (230 days)	30	6.9	207	8.0	5,974
Construction Medium-Duty Truck Total (Vendor)					*6,234*

Source: Vista Environmental, 2021

Table E-4: Estimated Construction Hauling Fuel Consumption (Heavy High Duty Trucks)

Construction Activity	Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Demolition (20 days)	18.4	20	7,340	8.0	923
Grading (20 days)	0.2	20	80	8.0	10
Construction Heavy-Duty Truck Total (Hauling)					*933*

Source: Urban Crossroads, 2019

Overall, construction activities would require limited energy consumption, would comply with all existing regulations, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. Thus, impacts related to construction energy usage would be less than significant and this topic will not be analyzed further in the EIR.

Operation

Once operational, the residential uses would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes but is not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. This use of energy is typical for residential development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. Additionally, the project includes features to reduce energy consumptions, such as Photovoltaic (PV) systems, energy efficient appliances, and Title 24 compliant lighting and plumbing fixtures.

As displayed in Table E-5, operation of the proposed project is estimated to result in the annual use of 122,615 kilowatt-hours (kWh) of electricity, 1,731 mega British thermal units (MBTU) and 63,187 gallons of fuel.

Table E-5: Operational Energy Consumption

Operational Energy	Total Energy Consumption Per Year
Electricity	122,615 kWh
Natural Gas	1,731 MBTU
Petroleum Fuel	63,187 gallons

Source: Vista Environmental, 2021.

The proposed residential development would be required to meet the current Title 24 energy efficiency standards. Typical Title 24 measures include increased insulation; use of energy-efficient appliances; Low-E windows; high-performance heating, ventilation and air conditioning equipment (HVAC); and more. Additionally, garages would be pre-wired for electric vehicle charging infrastructure, as required by Title 24.

The project applicant shall install PV systems of adequate size to generate enough electricity to meet the State's standards. The PV system would be pursuant to the Title 24 standards resulting in installation of at least 183.1 kilowatts of PV panels within the proposed project. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the proposed project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the proposed project's natural gas demand.

The project would consist of an urban infill redevelopment that would provide residential uses. As demonstrated by Table E-5, the project would result in the consumption of approximately 63,187 gallons of petroleum fuel per year, which would be utilized as transportation fuel. This fuel use would be consistent with other developments of similar size within the County and would equate to 0.0016 percent of the gasoline and diesel consumed in the County annually (Vista Environmental, 2021). Thus, the project would not result in wasteful, inefficient, or unnecessary use of fuel, and impacts would be less than significant.

In addition, the project site is within an area where existing infrastructure would provide for efficient delivery of electricity and natural gas to the project and the project would not inhibit the development of other alternative energy sources. Furthermore, other existing and future regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy. These include the federal Energy Independence and Security Act, the state Long Term Energy Efficiency Strategic Plan, SB 350, and AB 1007 (described above), which are designed to reduce reliance on non-renewable energy resources and reduce demand by providing federal tax credits for purchasing fuel-efficient items and improving the renewable fuel, appliance, and lighting standards. Thus, operation of the proposed project would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner, and impacts would be less than significant. This topic will not be further analyzed in the EIR.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☐ ☒

No Impact. As described previously, the proposed project would be required to meet the CCR Title 24 energy efficiency standards. The project is subject to and shall be in compliance with the Los Angeles County Green Building Standards Code. The Green Building Standards Code requirements which must be complied with include Green Building, Low-Impact Development, and Drought Tolerant Landscaping. The Green Building Standards Code, Title 31, states that the purpose of the County's Green Building Standards Code, which was adopted in 2010, is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or

positive environmental impact, and encouraging sustainable construction practices. As such, the proposed project would be designed to meet all applicable State building energy efficiency standards as well as to meet the County's energy efficiency standards. Redevelopment of the site would not result in obstruction of opportunities for use of renewable energy due to the addition of PV panels on each home. Thus, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur. This topic will not be further analyzed in the EIR.

Plans, Programs, and Policies
None.

Mitigation Measures
None.

7. GEOLOGY AND SOILS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

Less Than Significant Impact. There are no known active or potentially active faults within the project site or in the immediate area. The nearest fault line is the Sierra Madre Fault located approximately three (3) miles to the north (CGS 2020). Since no known faults exist within a mile of the project site, and the site is not located in an Alquist-Priolo Earthquake Fault Zone, impacts related to rupture of a known earthquake fault would be less than significant. This topic will not be further evaluated in the EIR.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Less than Significant Impact. The proposed project would add residents and development within the project site. The project site is within a seismically active region, with numerous faults capable of producing significant ground motions. The closest known active fault is the Sierra Madre fault located approximately three (3) miles to the north of the site (Geotek 2020). Therefore, project implementation could subject people and structures to hazards from ground shaking. However, seismic shaking is a risk throughout southern California, and the project site is not at greater risk of seismic activity or impacts as compared to other areas within the region.

The County of Los Angeles has adopted the California Building Code (CBC) as part of the County Code as Title 26, which regulates all building and construction projects within the County and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. Structures built in the County are required to be built in compliance with the CBC. The project would be required to adhere to the provisions of the CBC as part of the building plan check and development review process. Compliance with the requirements of the CBC for structural safety would reduce hazards from strong seismic ground shaking. Because the proposed project would be required to be constructed in compliance with the CBC and the County Code, and is included as PPP GEO-1, the proposed project would result in a less than significant impact related to strong seismic ground shaking. This topic will not be further analyzed in the EIR.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?	☐	☐	☒	☐

Less Than Significant Impact. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

The depth of groundwater on the project site is anticipated to be at a depth of 150 feet or greater, therefore, the potential for liquefaction to occur is low (Geotek 2020). Compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that project structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Compliance with the requirements of the CBC and County Code for structural safety (included as PPP GEO-1) would reduce hazards from seismic-related ground failure, including liquefaction and settlement to a less than significant level. This topic will not be further evaluated in the EIR.

iv) Landslides?	☐	☐	☒	☐

Less Than Significant Impact. The project site is relatively flat and does not contain any hills or steep slopes, nor is surrounded by any hills or steep slopes. However, the project is located approximately 0.48 mile (2,537 feet) south from the nearest landslide zone. Therefore, there is limited potential for landslides to occur on the project site or in the vicinity of the project. Due to the lack of onsite and offsite hills and slopes, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts related to landslides would be less than significant with implementation of the project. This topic will not be further evaluated in the EIR.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less Than Significant Impact. In its existing condition, the project site is developed with school buildings, fields, and ornamental vegetation. The project would involve the demolition of the existing school buildings and construction of a 68-unit single-family residential development on the project site. During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Additionally, during a storm event, soil erosion could occur at an accelerated rate. The increased erosion potential could result in short-term water quality impacts.

As discussed in further detail in Section 10, *Hydrology and Water Quality*, the proposed project would increase the impervious surface area on the project site compared to existing conditions. This would change the volume of stormwater runoff generated from the project site. However, since the project site is relatively flat, soil erosion would be controlled via implementation of standard erosion control practices required by a Stormwater Pollution Prevention Plan (SWPPP) during construction (included as PPP WQ-1).

Once developed, the project's implementation would not increase the volume of runoff from the project site because the proposed project would include landscaped pervious surfaces intended to capture stormwater runoff, as well as new drainage infrastructure designed to accommodate the increase in stormwater runoff, which is further described in Section 10, *Hydrology and Water Quality*. In addition, implementation of the project requires County approval of a site-specific Water Quality Management Plan (WQMP), which would ensure that the County Code, Regional Water Quality Control Board (RWQCB) requirements, and appropriate operational Best Management Practices (BMPs) would be implemented to minimize or eliminate the potential

for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant. This topic will not be analyzed further in the EIR.

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. As described previously, the project site is not located on or adjacent to a hillside, slope or within a liquefaction hazard area. Based on the relatively flat topography of the site, lack of a hills or free cliff faces nearby and lack of a liquefaction hazard area, the Geotechnical Report determined that there is no potential for lateral spreading on the site and it is not considered to be a hazard (Geotek 2020). Thus, impacts related to lateral spreading would be less than significant. Also, as described previously, impacts related to landslides would not occur. However, the Geotechnical Report identified that seismic inducted settlement onsite could be about 1-inch; and differential seismic settlement is estimated as less than ½-inch over a 40-foot span (Geotek 2020).

The Geotechnical Report identifies that the project site is not located within a liquefaction hazard zone. In addition, groundwater was not encountered in any exploratory borings which extended to a maximum depth of about 50 feet below ground surface (bgs), but the historic high groundwater is approximately 150 feet below the existing grade (Geotek 2020). As described in the previous response, the Geotechnical Report prepared for the project site provides CBC seismic structural design criteria that are specific to the onsite soils, including the soils settlement and minor ground subsidence conditions that could occur. The project includes excavation and recompaction of soils, and development of foundation systems in compliance with the CBC, as included as PPP GEO-1, which would require proper construction of building foundations to reduce impacts related to settlement and subsidence would not occur onsite.

The CBC, as currently adopted in County Code Title 26, requires that a California Certified Engineering Geologist or California-licensed civil engineer provide site-specific engineering data for the proposed structures, which are reviewed by the County for appropriate inclusion as part of the building plan check and development review process. Compliance with the requirements of the CBC and County Code for structural safety through implementation of as included as PPP GEO-1 would reduce potential impacts to a less than significant level.

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. As described previously**,** the Geotechnical Report describes that the site is underlain by alluvium. The alluvium varied from a poorly graded sand, silty sand to a sandy silt. The sandy soils were noted to range from loose to very dense and the silt soils possessed a medium stiff to hard consistency (Geotek 2020). However, the soils onsite would be excavated to a minimum of six (6) feet below existing or finished grade and at least seven (7) feet beyond the building perimeters, reconditioned, and recompacted as engineered fill to support the proposed building structures. As part of reconditioning the compacted engineered fill, the soils would be moisture conditioned, as required by the CBC for expansive soils (Geotek 2020).

Furthermore, prior to approval of construction, an engineering level design geotechnical report is required to be prepared and submitted to the County that details the project designs that have been included to address

potential geotechnical and soil conditions pursuant to the CBC requirements, that are included in the County Code Chapter in Title 26 and implemented by PPP GEO-1. Compliance with the CBC, through design level geotechnical specifications that would be reviewed and approved by the County Engineer, per PPP GEO-1 would ensure that potential impacts related to expansive soils would be less than significant.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

No Impact. Development of the project would connect into existing sewer infrastructure in San Bernardino Road and would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. Therefore, impacts related to septic tanks or alternative wastewater disposal methods would not occur and this topic will not be further evaluated in the EIR.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	☐	☐	☐	☒

No Impact. The project site is not located within any Hillside Management Area as specified in Los Angeles County Code, Title 22, Chapter 22.104. The project site is relatively flat with a gentle slope to the southwest and the surrounding area is also relatively flat. As such, the project would not conflict with the Hillside Management Area Ordinance and no impacts would occur. Therefore, this topic will not be further evaluated in the EIR.

Plans, Programs, and Policies

PPP GEO-1: CBC Compliance. The project is required to comply with the California Building Standards Code (CBC) as included in the County Code as Title 26, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for the proposed project shall be incorporated into grading plans and building specifications.

Mitigation Measures
None.

8. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Green House Gas (GHG) Thresholds

The SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold, that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - All land use types: 3,000 $MTCO_2E$ per year
    - Based on land use type:
        - Residential: 3,500 $MTCO_2E$ per year
        - Commercial: 1,400 $MTCO_2E$ per year
        - Mixed use: 3,000 $MTCO_2E$ per year
- Tier 4 has the following options:
    - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
    - Option 3: A project-level efficiency target of 4.8 MTCO2e per service population as a 2020 target and 3.0 MTCO2e per service population as a 2035 target. The recommended plan-level target for 2020 is 6.6 MTCO2e and the plan level target for 2035 is 4.1 MTCO2e.

The Tier 3 all land use type threshold of 3,000 MTCO2e per year per service population is utilized to determine if the proposed project has the potential to result in significant GHG emissions impacts. While the 3,500 MTCO2e threshold could have been used for the proposed residential project, the 3,000 MTCO2e threshold was applied in order to provide a more conservative analysis. SCAQMD describes that the threshold is based on an emission capture rate of 90 percent.

Less than Significant Impact.

Construction

Construction of the proposed project is anticipated to occur in four phases that would last approximately 21 to 27-months. The construction-related activities involve the following: demolition, site preparation, grading, paving, construction of structures and infrastructure, and architectural coatings. These construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. Total estimated construction related GHG emissions from construction of the proposed project were amortized over 30 years and added to the project's operational emissions per SCAQMD methodology. As shown on Table GHG-1, construction of the project would result in approximately 18.99 $MTCO_2e$ per year.

Table GHG-1 Summary of Greenhouse Gas Emissions (Annual)

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Area Sources	1.44	0.00	0.00	1.47
Energy Usage	122.09	0.00	0.00	122.75
Mobile Sources	706.86	0.04	0.00	707.75
Solid Waste	8.45	0.50	0.00	20.95
Water and Wastewater	22.59	0.12	0.00	26.54
Construction	18.91	0.00	0.00	18.99
Total Emissions	**880.34**	**0.66**	**0.00**	**898.44**
Total CO_2E (All Sources)	**898.44**			
SCAQMD Threshold	**3,000**			
Exceedance?	Not Exceeded			

Source: Vista Environmental, 2021.

Operation

The estimated operational GHG emissions that would be generated from operation of the proposed project are shown in Table GHG-1. This analysis assumes that the project site is currently not generating any GHG emissions, as the school is currently vacant. As shown, the total net annual GHG emissions would be approximately 898.44 $MTCO_2e$ per year, which would be less than the SCAQMD Tier 3 threshold of 3,000 $MTCO_2e$ per year per service population. Therefore, impacts related to GHG emissions would be less than significant and this topic will not be further evaluated in the EIR.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

Less than Significant Impact. The CARB Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. The CARB Scoping Plan recommendations serve as statewide measures to reduce GHG emissions levels. The proposed project would be consistent with the applicable measures established in the Scoping Plan.

The proposed project would be implemented pursuant to the 2019 CALGreen Building (Title 24) requirements, and provide new land uses in a sustainable manner. Typical Title 24 measures include increased insulation; use of energy and water efficient appliances; water efficient plumbing and fixtures; Low-E windows, high performance; heating, ventilation and air conditioning equipment (HVAC); and more. In complying with the 2019 Title 24 standards, the project would be implementing regulations that reduce GHG emissions.

Additionally, the County Climate Action Plan (CCAP) includes reduction measures that would help the County achieve its emissions reduction goal, which is consistent with the statewide goals identified. The CCAP includes 26 local actions. The local actions are grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. Many of the local actions are cost effective, particularly in the green building and energy strategy area, with several energy efficiency investments that can recoup initial costs in one to five years. In addition to reducing GHG emissions, all local actions have many co-benefits, such as improved public health. Local actions are responsible for achieving the remaining 20 percent of the total GHG reductions targeted in the CCAP. The project would comply with reduction measures for new residential development as outlined in the CCAP that reduce GHG emissions. Therefore, the proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts would be less than significant. This topic will not be further evaluated in the EIR.

Plans, Programs, and Policies
None.

Mitigation Measures
None.

9. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☒	☐	☐

Less than Significant Impact with Mitigation.
Construction
The proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are subject to federal, state, and County regulations. As a result, hazardous material impacts related to construction materials would be less than significant.

Asbestos-Containing Materials. The use of asbestos-containing materials (a known carcinogen) and lead paint (a known toxin) was common in building construction prior to 1978 (the use of asbestos-containing materials in concrete products was common through the 1950s). Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the federal Environmental Protection Agency (EPA). Federal asbestos requirements are found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M, and are enforced in the project area by the SCAQMD.

Based on the age of the onsite school buildings, it is possible that asbestos-containing building materials are present in the existing structures on the project site. As a result, asbestos surveys and abatement would be required prior to demolition of the existing buildings pursuant to the existing SCAQMD, Cal/OSHA, and Section 19827.5 of the California Health and Safety Code requirements.

SCAQMD Rule 1403 requires notification of the SCAQMD prior to commencing any demolition or renovation activities that involve asbestos containing materials. Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with asbestos-containing materials. With compliance with AQMD Rule 1403, included as PPP HAZ-1, potential impacts related to the disposal of asbestos-containing materials would be less than significant.

Lead Based Paint. Based on the age of the existing school buildings, it is also possible that lead-based paint may be present. Pursuant to existing regulations, a lead-based paint survey shall be completed prior to any activities with the potential to disturb suspected lead based painted surfaces. The regulations specify actions to manage and control exposure to lead-based paint (per the Code of Federal Regulations Title 29, Section 1926.62 and California Code of Regulations Title 8 Section 1532.1) that cover the demolition, removal, cleanup, transportation, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers

exposed to lead-based materials. In addition, Cal/OSHA's Lead in Construction Standard requires the project to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. With compliance to the Cal/OSHA requirements, included as PPP HAZ-2, potential impacts related to the disposal of lead-based paint would be less than significant.

Onsite Soils

Historically, the property and surrounding properties were occupied by orchard land from at least 1928 until at least 1952. A wide variety of pesticides may have been used during this period, including those containing persistent compounds such as arsenic and lead. Therefore, the Limited Phase II Environmental Site Assessment (ESA) conducted soils testing and compared the laboratory test results to the U.S. Environmental Protection Agency (EPA) and CAL-EPA/ Department of Toxic Substances Control (DTSC) residential screening levels. The Phase II ESA found that no organochlorine pesticides were detected in the soil samples. As such, the onsite soils are not contaminated with organochlorine pesticides.

The Phase II ESA also found that concentrations of lead ranged from 6.13 to 66 ppm and are lower than the Regional Screening Levels (RSLs) established by the Environmental Protection Agency (EPA) for this metal. Therefore, the onsite soils are not contaminated with lead. However, the Phase II ESA testing identified arsenic in soils samples at concentrations higher than the residential RSLs established by the EPA. The Phase II ESA describes that excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. As described in Section 3, *Air Quality*, standard dust mitigation measures (pursuant to AQMD Rule 403) would be implemented during all soil handling activities. With implementation of MM HAZ-1 and MM HAZ-2, impacts related to contaminants in soils would be less than significant. Therefore, this topic will not be further analyzed in the EIR.

Operation

Operation of the proposed project includes activities related to single-family residential development, which generally uses common hazardous materials, including: solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. Although the project would utilize common types of hazardous materials, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the project. Operation of the proposed project may generate household hazardous wastes. As such, Mitigation Measure HAZ-3 has been included to require provision of education materials on the proper management and disposal of household hazardous waste to homeowners. With implementation of MM HAZ-3, operational impacts related to routine transport, use, and disposal of hazardous materials during operation of the project would be less than significant. Therefore, this topic will not be further analyzed in the EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment? ☐ ☒ ☐ ☐

Less than Significant Impact with Mitigation.
Construction

Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, excavation, grading, and construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, implementation of the proposed project could potentially result in the accidental release of hazardous materials. The use of BMPs during construction implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit (and included as PPP WQ-1) would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Contaminated Soils. Due to the existence of the contaminated soils and excavation activities that would occur during project construction, implementation of the proposed project has the potential to result in upset or accident conditions involving the release of hazardous materials into the environment.

Implementation of PPP AQ-1, which requires compliance with SCAQMD Rule 403 for fugitive dust control, would ensure that exposed soils that potentially contain arsenic or other hazardous materials would not result in fugitive dust. Additionally, Mitigation Measure HAZ-1 is included to require preparation of a soils testing plan and to outline disposal requirements. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. With implementation of Mitigation Measure HAZ-1 and HAZ-2 impacts related to hazards from contaminated soils would be less than significant.

Asbestos Containing Materials. Asbestos abatement contractors must follow state regulations contained in California Code of Regulations Sections 1529, and 341.6 through 341.14 as implemented by SCAQMD Rule 1403 to ensure that asbestos removed during demolition or redevelopment of the existing buildings is transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition permit until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. These requirements are included as PPP HAZ-1 to ensure that the project applicant submits verification to the County that the appropriate activities related to compliance with existing asbestos regulations have occurred, which would reduce the potential of impacts related to asbestos to a less than significant level.

Lead Based Materials The lead exposure guidelines provided by the U.S. Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62, and state regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1, as implemented by Cal-OSHA. Cal/OSHA's Lead in Construction Standard requires project applicants to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan to be submitted to Cal/OSHA must

describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. These requirements are included as PPP HAZ-2 to ensure that the project applicant submits verification to the County that the appropriate activities related to existing lead regulations have occurred, which would reduce the potential of impacts related to lead-based materials to a less than significant level.

Undocumented Hazardous Materials. As described previously, the project site has a history of various uses that includes use and storage of hazardous materials. As a result, there is the potential for undocumented hazardous material to exist onsite. However, the existing federal and state regulations related to hazardous materials and construction includes procedures to follow in case hazardous materials are uncovered during construction activities.

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These regulations are detailed previously and include, but are not limited to, the federal Resource Conservation and Recovery Act, the Occupational Safety and Health Act that is implemented by OSHA, and the Hazardous Materials Transportation Act. Additionally, the California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27). Furthermore, Mitigation Measure HAZ-1 would reduce impacts related to other soil contamination not identified previously. Thus, with implementation of existing regulations and Mitigation Measures HAZ-1and HAZ-2, impacts related to upset or accident conditions involving the release of hazardous materials into the environment would be less than significant. Therefore, this topic will not be further analyzed in the EIR.

Operation

As described above, the risks related to upset or accident conditions involving the release of hazardous materials into the environment would be adequately addressed through compliance with existing federal, state, and local regulations such as County Code Chapter 12.80 and Chapter 12.52. Development under the proposed project would involve single-family residential uses that would use and store common hazardous materials such as paints, solvents, and cleaning products. Also, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. Normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the project. In addition, a Water Quality Management Plan (WQMP) is required to be implemented for the project (as further discussed in Section 8, *Hydrology and Water Quality* and included as PPP WQ-2. The BMPs that would be implemented as part of the WQMP would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the project. As a result, operation of the proposed project would not result in 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, and impacts would be less than significant. Therefore, this topic will not be further analyzed in the EIR.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. The project site is located 0.27 mile from the closest school, which is Merwin Elementary School, located at 16125 Cypress Street Covina, CA 91722, and 0.3 miles from Manzanita Elementary School, located at 4131 North Nora Ave, Covina, CA 91722. Thus, the proposed project would not be within one-quarter mile of an existing school. However, the project is directly adjacent to, and within a quarter mile, of existing residences.

Construction

As described in the previous responses, project construction would involve the use and disposal of various hazardous materials. However, all storage, handling, use, and disposal of these materials are regulated by federal and state regulations and will be subject to County guidelines, such as those included as PPP HAZ-1 and PPP HAZ-2. In addition, PPP AQ-1 and Mitigation Measures HAZ-1 and HAZ-2 would ensure that contaminated soils are not released into the environment, as described in Impact HAZ-1 and HAZ-2. While the project would involve the use and disposal of various hazardous materials, compliance with federal and state regulations, and implementation of MM HAZ-1 and MM HAZ-2 would reduce impacts to a less than significant level. Therefore, this topic will not be further discussed in the EIR.

Operation

Operation of the proposed project includes activities related to single-family residential development, which generally uses common hazardous materials, including solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. Normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, sensitive adjacent residences, or school facilities in the vicinity of the project. Therefore, operational impacts related to nearby schools would be less than significant. Therefore, this topic will not be further discussed in the EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

No Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the project site is not located on a federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site (DTSC 2020). Therefore, the proposed project would not result in an impact related to a known hazardous materials site pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. This topic will not be further analyzed in the EIR.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ☐ ☐ ☐ ☒

No Impact. The proposed project is not within an airport land use plan and is located approximately 5.5 miles to the east of the San Gabriel Airport, which is the closest airport and is open for public use. Additionally, the residential development would not be of a sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Therefore, the proposed project would not result in impacts to an airport land use plan, or where such a plan has not been adopted, and would not result in a safety hazard

or excessive noise for people residing or working in the project area. Therefore, this topic will not be further analyzed in the EIR.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less Than Significant Impact.

Construction.

The proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The County's General Plan Safety Element outlines goals and policies aimed at reducing the potential risk of death, injuries, and economic damage resulting from natural and man-made hazards. Additionally, the County's General Plan Safety Element works in conjunction with the Operational Area Emergency Response Plan, which is prepared by County's Chief Executive Office - Office of Emergency Management. The Operational Area Emergency Response Plan strengthens short and long-term emergency response and recovery capability and identifies emergency procedures, as well as emergency management routes in Los Angeles County.

The Office of Emergency Management prepares the All-Hazard Mitigation Plan, which provides policy guidance for minimizing threats from natural and man-made hazards in Los Angeles County. The All-Hazard Mitigation Plan includes a compilation of known and projected hazards in Los Angeles County. The All-Hazard Mitigation Plan also includes information on historical disasters in Los Angeles County.

The proposed project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. During short-term construction activities, the proposed project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the project site. Therefore, impacts related to emergency response and evacuation plans associated with construction of the proposed project would be less than significant.

Operation

The proposed project does not include any changes to public or private roadways that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. During the operational phase of the proposed project, onsite access would be required to comply with standards established by the County.

The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to County's fire standards. The proposed project would provide adequate emergency access to the site via private shared driveways from San Bernardino Road. Further, access to and from the project site for emergency vehicles would be reviewed and approved by the County as part of the approval process to ensure the proposed project is compliant with all applicable codes and ordinances for emergency vehicle access. Therefore, impacts related to interference with an emergency response plan are considered less than significant. Therefore, this topic will not be further analyzed in the EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?	☐	☐	☐	☒

No Impact. The project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (CAL FIRE 2020). Furthermore, the project site would include adequate access, as discussed above in response 9(f). Therefore, impacts related to wildland fires would not occur. Therefore, this topic will not be further analyzed in the EIR.

ii) within an area with inadequate water and pressure to meet fire flow standards?	☐	☐	☒	☐

Less than Significant Impact. The project site is located within an urban developed area and is not located within an identified wildland fire hazard area and is not an area where residences are intermixed with wildlands. The project would include onsite water pipes that connect to the existing water line in San Bernardino Road. Furthermore, the project is required to comply with Los Angeles County Code Sections 20.16.040 and 20.16.060, which set water flow requirements for residential developments, onsite water lines, and fire hydrants. The Fire Hydrant Flow Report that was conducted by Azusa Light & Water found that the existing hydrant has a flow of 4,290 gpm at 20 psi, which meets the required flow standard of 1,250 fpm at 20 psi for 2 hours (FIRE 2020). Therefore, the project would not expose people or structures to a significant risk involving fires because the project is located within an area with inadequate water and pressure to meet fire flow standards. Impacts would be less than significant, and this topic will not be further discussed in the EIR.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	☐	☐	☒	☐

Less Than Significant Impact. The project site is not within proximity to land uses that have the potential for a dangerous fire hazard. The area surrounding the project site is developed with single-family residences and is not in an area with excessive amounts of dry brush that pose significant fire risks. The train tracks adjacent to the proposed project are maintained and properly cleared of dry brush by Metrolink contractors and the train tracks do not pose a significant hazard. The proposed project consists of residential land uses. This land use would not generate potential impacts related to a dangerous fire hazard. Therefore, this topic will not be further analyzed in the EIR.

h) Does the proposed use constitute a potentially dangerous fire hazard?	☐	☐	☐	☒

No Impact. The proposed project would develop residential land uses. None of the uses related to the proposed project would constitute a potentially dangerous fire hazard and impacts would not occur. Therefore, this topic will not be further analyzed in the EIR.

Plans, Programs, and Policies

PPP HAZ-1: SCAQMD Rule 1403. Pursuant to existing regulations, prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District (SCAQMD) Rule 1403. Prior to issuance of demolition permits the applicant shall provide verification that the following SCAQMD Rule 1403 regulations have been taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

PPP HAZ-2: Lead. Pursuant to existing regulations, prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, County demolition permits shall ensure that all procedural requirements and regulations are followed for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

Mitigation Measures

Mitigation Measure HAZ-1: Prior to issuance of a grading permit, a soils testing plan for arsenic shall be prepared by a qualified hazardous materials consultant and shall detail procedures and protocols for testing any soils that require offsite disposal. Based on testing results soils shall be transported and disposed of per California Hazardous Waste Regulations to an appropriately permitted landfill. Any soil contaminated with concentrations of arsenic exceeding 12 ppm shall be removed and transported to an appropriately permitted disposal facility prior to site grading and development activities. Should the volume of arsenic impacted soil exceed 50 cubic yards, a SCAQMD Rule 1466 permit would be required and shall be implemented during soil excavation and removal activities. Soils testing and disposal requirements shall be included within all grading permits and specifications.

Mitigation Measure HAZ-2: Due to the potential for onsite soils to contain elevated levels of arsenic, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719). The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of arsenic are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase 1 and Phase II ESAs. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.

Mitigation Measure HAZ-3: As part of the Home Buyer's package, the project Applicant/Owner shall provide new homeowners education materials on the proper management and disposal of household hazardous waste. The educational materials shall provide new homeowners with links to the County Department of Public Works' website regarding the Loa Angeles County Household Hazardous Waste Collection Program and provide the addresses of permanent household hazardous waste collection centers.

10. HYDROLOGY AND WATER QUALITY

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

Less than Significant Impact.

Construction

Implementation of the proposed project includes development involving demolition of the existing structures and pavement, site preparation, construction of new buildings, and infrastructure improvements. Demolition of existing structures, grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, the use of BMPs during construction implemented as part of a F as required by the NPDES General Construction Permit and included as PPP WQ-1 would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a Qualified SWPPP Developer (QSD) is required to be included in the SWPPP for the project, and typically includes the following types of erosion control methods that are designed to minimize potential pollutants entering stormwater during construction:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;

- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on County roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, included as PPP WQ-1, would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Therefore, this topic will not be further discussed in the EIR.

Operation

The proposed project would result in operation of additional residential uses on the site that could generate pollutants such as, suspended solids, nutrients, bacteria/viruses/pathogens, pesticides, oil and grease, trash and debris. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, new development of the project would be required to comply with the NPDES permit requirements, which are included in the Los Angeles County Code Chapter 12.80, that would limit the potential for pollutants to discharge from the site.

Pursuant to the existing requirements, construction includes installation of drainage infrastructure that would convey runoff to the south to a basin for infiltration and treatment. After treatment through the infiltration basin, flows that have not infiltrated into site soils would be conveyed to the existing stormwater culvert in East San Bernardino Road.

In compliance with the NPDES Permit and Los Angeles County Code, development projects are required to prepare a Low Impact Development (LID) report, included as PPP WQ-2. The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit. A Preliminary LID report has been developed (included as Appendix J) per these requirements and it includes various BMPs to be incorporated, including those listed in Table HYD-1.

Table HYD-1: Types of BMPs Incorporated into the Project Design

Type of BMP	Description of BMPs
LID Site Design	Optimize the site layout: The site has been designed so that runoff from impervious surfaces would flow to a detention basin and drywell for infiltration and treatment. This would slow and retain runoff.
	Use pervious surfaces: Landscaping is incorporated into the project design to increase the amount of pervious area and onsite retention of stormflows.
Source Control	Storm Drain Stenciling: All inlets/catch basins would be stenciled with the words "Only Rain Down the Storm Drain," or equivalent message.
	Need for future indoor & structural pest control: The buildings would be designed to avoid openings that would encourage entry of pests.
	Landscape/outdoor pesticide use: Final landscape plans would accomplish all of the following: • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution.

	• Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions
	Roofing, gutters and trim: The architectural design would avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.
	Plazas, sidewalks and parking lots: Plazas, sidewalks, and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing would be collected to prevent entry into the storm drain system. Wash water containing any cleaning agent or degreaser would be collected and discharged to the sanitary sewer and not discharged to a storm drain.
Treatment Control	Biofiltration Systems: The proposed detention and infiltration basin would detain runoff, filter it prior to discharge.
	Pretreatment: Pretreatment for stormwater flows will be accomplished using overland grass filter strips, prior to water entering the infiltration basin.

As described previously, pursuant to County Code Section 12.84.450, the LID report is required to be approved prior to the vesting tentative tract map approval which would ensure it complies with the Los Angeles County RWQCB Municipal Separate Storm Sewer System (MS4) Permit regulations. Overall, implementation of the LID report pursuant to the existing regulations (included as PPP WQ-2) would ensure that implementation of the proposed project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant. Therefore, this topic will not be discussed in the EIR.

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. Water to the project site would be provided by Azusa Light and Water (ALW) per the water will serve letter dated March 18, 2020. The Main San Gabriel Groundwater Basin provides approximately 66.2 percent of ALW's water supply. The remaining supply comes from the San Gabriel River (33.8%). Watermaster provides management of groundwater supplies within the Main San Gabriel Groundwater Basin through their yearly Operating Safe Yield. As shown on Table HYD-1, the ALW's Urban Water Management Plan (UWMP) shows that the anticipated production of groundwater would remain steady from 2020 through 2040 and that in 2040 approximately 63.3 percent of supply would be from the Main San Gabriel Groundwater Basin, 26.3 percent would be from surface water from the San Gabriel River, and 10.4 percent from imported/purchased sources.

Table HYD-2: Azusa Light and Water Projected Water Supply Projections (acre-feet)

Source	2020	2025	2030	2035	2040	2040 Percentage
San Gabriel Groundwater Basin	24,350	24,350	24,350	24,350	24,350	63.3%
Imported/Purchased	4,000	4,000	4,000	4,000	4,000	10.4%
Surface	10,100	10,100	10,100	10,100	10,100	26.3%
Total	38,450	38,450	38,450	38,450	38,450	100%

2015 UWMP.

As detailed in Section 19, *Utilities and Service Systems*, the supply of water listed in Table HYD-2 would be sufficient during both normal years and multiple dry year conditions to meet all of the service area's estimated needs, including the proposed project. Therefore, the project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. Furthermore, as discussed previously, the project would include an infiltration basin and would comply with required LID standards, which would ensure the project would not significantly decrease groundwater infiltration onsite. Thus, impacts related to groundwater supplies would be less than significant. Therefore, this topic will be evaluated in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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. The project site does not include, and is not adjacent to, a stream or river, or within a floodplain. Implementation of the project would not alter the course of a stream or river.

Construction

Construction related to implementation of the proposed project would expose and loosen building materials and sediment, which has the potential to mix with storm water runoff and result in erosion or siltation off-site. However, as described previously the NPDES Construction General Permit and Los Angeles County Code Chapter 12.80 requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities (included as PPP WQ-1). The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit through a SWPPP (per PPP WQ-1) would prevent construction-related impacts to potential alteration of a drainage pattern or erosion from development activities. Overall, with implementation of the existing construction, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion, siltation, and increases in stormwater runoff would be less than significant.

Operation

The project site is currently 40 percent impervious and contains approximately 3.8 acres of impervious surfaces, and stormwater flows from the south into existing drainage culverts in East San Bernardino Road. The proposed drainage system would convey runoff to the south, to a surface detention basin for infiltration and treatment. After treatment within the basin, flows that have not infiltrated into site soils would be conveyed to an existing stormwater culvert in East San Bernardino Road. Therefore, the project would not substantially alter the drainage pattern of the area.

In addition, as detailed in the LID Plan (Appendix J), the proposed project would not result in an increase of impervious surfaces on the site. With implementation of the proposed project the site would be 40 percent impervious. As described in the LID Plan calculations (Appendix J), in the existing 40 percent impervious condition, the area has a runoff flow rate of 18.35 cubic feet per second (cfs) during a 25-year storm. With implementation of the project, the addition of LID BMPs would result in a 25-year storm flow of 17.61 cfs, which is a 0.44 cfs decrease in runoff compared to the existing condition (Moran 2021). Therefore, stormwater runoff from the project site would decrease with implementation of the proposed project; and additional runoff would not occur that could cause substantial erosion or siltation. With the decrease in stormwater runoff and implementation of the MS4 permit regulations implemented through the Preliminary LID plan, which is reviewed by the County Department of Public Works, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant. This topic will not be further analyzed in the EIR.

(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐

Less than Significant Impact.
Construction
Implementation of the proposed project would include construction activities that could temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the proposed construction requires a SWPPP (included as PPP WQ-1) that would address site specific drainage issues related to construction activities and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities by the Contractor's Qualified SWPPP Practitioner (QSP). Compliance with the California State Water Resources Control Board Construction General Permit and a SWPPP (per PPP WQ-1), would prevent construction-related impacts related to potential alteration of a drainage pattern or flooding on or off-site from development activities. Therefore, impacts would be less than significant.

Operation
As described previously, the proposed project would not result in an increase in impervious surfaces over current conditions. As described in the LID Plan calculations (Appendix J), with implementation of the project, the implementation of BMPs would result in a 25-year storm flow of 17.61 cfs, which is a 0.44 cfs decrease in runoff on the site (Moran 2021). Therefore, stormwater runoff from the project site would decrease with implementation of the proposed project and would not cause flooding on or off-site. Therefore, impacts related to flooding from operational activities would be less than significant. This topic will not be further analyzed in the EIR.

(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?	☐	☐	☒	☐

Less than Significant Impact.
Construction
As described in the previous response, construction could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled.

However, as described previously, implementation of construction requires a SWPPP (included as PPP WQ-1) that would address site specific pollutant and drainage issues related to construction and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities by the Contractor's QSP. Compliance with the California State Water Resources Control Board Construction General Permit and SWPPP (per PPP WQ-1), would prevent construction-related impacts related to increases in runoff and pollution from development activities. Therefore, impacts would be less than significant.

Operation

As described previously, with implementation of the project, the implementation of BMPs would result in a 25-year storm flow of 17.61 cfs, which is a 0.44 cfs decrease in runoff from the site (Moran 2021). Therefore, stormwater runoff from the site would decrease with implementation of the proposed project and would not exceed the capacity of stormwater drainage systems.

In addition, the proposed project would install drainage infrastructure onsite that would convey runoff to a surface detention basin for infiltration and treatment. After treatment within the basin, flows that have not infiltrated into site soils would be conveyed to an existing stormwater culvert within East San Bernardino Road. This proposed stormwater system would control stormwater drainage and provide filtration to remove pollutants prior to discharge of runoff that is not infiltrated onsite.

In compliance with the NPDES Permit and County Code Chapter 12.84, the development within the project site is required to implement a LID, included as PPP WQ-2. The proposed drainage design and engineering plans would be reviewed by the County's Department of Public Works to ensure that construction specifications adhere to MS4 permit regulations, which would ensure that pollutants are removed prior to discharge. Overall, with compliance to the existing regulations, impacts related to the capacity of the drainage system and polluted runoff would be less than significant. This topic will not be evaluated in the EIR.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	☐	☐	☐	☒

No Impact. According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (Map 06037C1700F), the project site is located in Zone X, which is an area located outside of the 100-year and 500-year floodplains. Therefore, development of the project would not impede or redirect flood flows, and no impacts would occur. This topic will not be further evaluated in the EIR.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	☐	☐	☐	☒

No Impact. As discussed in response 10(c)(iv), the project site is not within a flood hazard zone and would not place structures in a Federal 100-year flood hazard zone or County Capital Flood Severe Flood Hazard Area. Therefore, impacts relating to flood hazards would not occur and this topic will not be further analyzed in the EIR.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)? ☐ ☐ ☒ ☐

Less than Significant Impact. The Los Angeles County LID ordinance was designed to manage rainfall and stormwater runoff in urban areas through the distribution of small, cost-effective landscape features throughout project sites. Such features include bio-retention/filtration landscape areas, reduced impervious surfaces, and functional landscaping and grading.

Pursuant to Chapter 12.84 of the County's Code (Low-Impact Development Standards), construction, and operation BMPs would be implemented as a standard condition of the proposed project, which would reduce impacts to water quality during construction and operation, including those impacts associated with soil erosion and siltation. The LID Standards require that new development (1) mimics undeveloped stormwater runoff rates and volumes in any storm event up to and including the Capital Flood (2) prevents pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event, and (3) minimizes hydromodification impacts to natural drainage systems. The project is subject to Chapter 12.48 of the County's Code.

As described previously, with implementation of the project, the implementation of BMPs would result in a 25-year storm flow of 17.61 cfs, which is a 0.44 cfs decrease in runoff on the site (Moran 2021). Therefore, stormwater runoff from the site would decrease compared to existing runoff flow.

Development of the proposed project would be subject to the Los Angeles County's LID and would incorporate BMPs that are consistent with LID. Therefore, impacts would be less than significant and will not be further evaluated in the EIR.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)? ☐ ☐ ☐ ☒

No Impact. Wastewater from the project site is conveyed via County sewer infrastructure to the San Jose Creek Water Reclamation Plant which currently provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day within a portion of the Los Angeles County Sanitation Districts. No wastewater treatment systems are proposed as part of the project. The proposed project would not include an onsite wastewater treatment system. Therefore, no impacts would occur. This topic will not be further analyzed in the EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☐ ☒

No Impact. As discussed in response 10(c)(iv), the project site is not within a flood hazard zone, and flooding will not be analyzed in the EIR.

Tsunamis are tidal waves generally caused by earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The project site is approximately 30 miles from the Pacific Ocean shoreline. Based on the inland location of the site, the project site is not within a tsunami zone. Therefore, this topic will not be analyzed in the EIR.

A seiche is a wave created in a landlocked body of water (e.g., a lake or a reservoir) from back-and-forth movement of the water resulting from high winds or an earthquake. There are no inland bodies of water close enough to the project site to pose a flood hazard from a seiche. Therefore, this topic will not be analyzed in the EIR.

Thus, the project site is not located within a flood hazard, tsunami hazard, or seiche zone and is not at risk of release of pollutants due to inundation. Therefore, no impacts would occur. This topic will not be further analyzed in the EIR.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Less than Significant Impact. As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit and PPP WQ-1 would serve to ensure that construction activities do not result in a degradation of water quality, and impacts would be less than significant. Thus, construction associated with the proposed project would not conflict or obstruct implementation of a water quality control plan.

Also, as described previously, new development projects are required to implement LID (per the Regional MS4 Permit), and a LID report is included as PPP WQ-2. The LID specifications and BMPs and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed project would not conflict with or obstruct implementation of a water quality control plan.

As described previously, with implementation of the project, the implementation of BMPs would result in a 25-year storm flow of 17.61 cfs, which is a 0.44 cfs decrease in runoff on the site (Moran 2021). The project provides for infiltration through landscaping areas and the surface detention basin that provides for infiltration of stormwater. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant. This topic will not be further analyzed in the EIR.

Plans, Programs, and Policies

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the County Department of Public Works evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP WQ-2: LID. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the County Department of Public Works The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.

Mitigation Measures
None.

11. LAND USE AND PLANNING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐

Less than Significant Impact. The project site is bounded by a railway easement to the north, San Bernardino Road to the south, and single-family residential developments to the east and west. The proposed project would replace the existing school buildings with single-family residential uses and would not physically divide an established community. The land uses proposed for the site are consistent with the land uses designated by County's General Plan, as well as consistent with residential land uses in the immediate project vicinity. In addition, project implementation would not disturb or alter access to any existing adjacent uses. Therefore, the proposed project would not result in the physical division of any established community, and impacts would be less than significant. This topic will not be further analyzed in the EIR.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Less than Significant Impact. The main documents regulating land use for the project site and immediate vicinity are the County's General Plan and Zoning Code. The proposed project's relationship to these planning documents is described below.

General Plan

The County's General Plan is the principal land use document guiding development within unincorporated Los Angeles County. The General Plan is a comprehensive plan that establishes goals and policies intended to guide growth and development in the County.

The project site currently has a General Plan land use designation of Public and Semi-Public (P). As discussed previously in the project's *Environmental Setting*, General Plan and Zoning, the P designation allows residential land uses because the area surrounding the project site is similar to and compatible with the proposed single-family residences. The existing surrounding residential uses are designated as Residential 9 (H9), which allows for single-family residential uses at densities of up to nine (9) dwelling units per net acre. Therefore, the project's density of approximately 7.16 dwelling units per net acre would be consistent and compatible with the surrounding residential densities. Therefore, the proposed project is consistent and compatible with the General Plan.

Zoning Code

Title 22 of the Los Angeles County Codes describes and elaborates on permitted land uses and contains more specific information related to permitted uses and development standards., The project site has a zoning designation of A-1-6000, which requires a minimum lot size of 6,000 square feet. According to Title 22, Section 22.16.030 of the Los Angeles County Code, single-family residences are allowable uses in this zone.

The proposed project would develop 68 single-family residences within the 9.61-acre project site. The project would include one multi-family residential lot of 9.61 gross (9.5 net) acres. The proposed project would

comply with the minimum required lot area requirement set forth in Title 22 of the Los Angeles County Code, and the proposed project would not conflict with the land use plan, policies, or regulations. Therefore, this topic will not be further analyzed in the EIR.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	☐	☐	☐	☒

No Impact. The proposed project is within an urbanized residential area of unincorporated Los Angeles County. The proposed project is not located within any habitat conservation plan or natural community conservation plan and is not located in a Hillside Management Area or Significant Ecological Area. Therefore, no impact would occur, and this topic will not be further analyzed in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

12. MINERAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 value to the region and the residents of the state?	☐	☐	☒	☐

Less than Significant Impact. The proposed project is within a Mineral Resource Zone (MRZ) zone, as shown in Figure 9.6 of the County's General Plan. According to the California Division of Mines and Geology, the project site is partially zoned as MRZ-2 and MRZ-3. Therefore, there are potentially mineral resources within onsite soils. However, the project site has not been historically used for the mining of mineral resources and the current use as a school would not allow for the extraction of mineral resources on the site. As such, the proposed project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Therefore, impacts are less than significant, and this topic will not be further evaluated in the EIR.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

Less than Significant Impact. As discussed previously, the project site is within an MRZ zone within the County's General Plan. However, no mineral extraction activities occur on the site currently, or historically. As such, the proposed project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Therefore, impacts are less than significant, and this topic will not be further evaluated in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

13. NOISE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☒	☐	☐

Less than Significant with Mitigation.

Regulatory Background

The General Plan EIR Noise and Vibration Section ("Noise and Vibration") and General Plan Noise Element discuss the fundamentals of sound, overall regulatory frameworks, various noise level standards, and potential noise impacts as well as mitigations to reduce those impacts. As a part of the regulatory framework, this chapter incorporates County Code Section 26.1207 ("Building Code") and Section 12.08 ("Noise Control Ordinance"). The Building Code Section discusses prevention or mitigation of excessive noise through construction and materials. The Noise Control Ordinance is intended to control unnecessary, excessive, and annoying noise and vibration. This ordinance defines terms, identifies noise zones, provides standards for interior and exterior noise, identifies specific noise that is exempt from exterior noise standards, and hours for noise regulation. County Code Section 12.12 provides additional regulation of construction noise. The proposed project would be subject to all county regulations as specified in the relevant building codes and noise control ordinance.

Adherence with the noise ordinance and following best management practices during construction should minimize noise levels to the best extent possible. Best management practices may include but not limited to the following:

- Where feasible, use on-site electrical powered sources rather than diesel operated equipment. Locate equipment and staging areas furthest from nearby sensitive receptors, where feasible.
- Use temporary noise barriers/enclosures around stationary equipment as needed to minimize noise levels.
- Ensure that operating equipment is maintained in good condition.
- If the construction involves pile driving, the contractor should use caisson pile drilling or other quieter method, where feasible. Use temporary noise barriers as needed.
- The contractor should schedule operations such that noise impacts would be minimized and avoid operating several pieces of equipment simultaneously, where feasible.
- Staging and or loading/unloading areas should be located furthest from nearby residential and school properties.

Construction

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: demolition, excavation and grading, building construction, architectural coating,

paving. Noise levels generated by heavy construction equipment can range from approximately 74 dBA to 90 dBA when measured at 50 feet, as shown on Table NOI-1.

Table NOI-1: Construction Reference Noise Levels

Equipment Description	Number of Equipment	Acoustical Use Factor[1] (percent)	Spec 721.560 Lmax at 50 feet[2] (dBA, slow[3])	Actual Measured Lmax at 50 feet[4] (dBA, slow[3])
Demolition				
Concrete/Industrial Saw	1	20	90	90
Excavators	3	40	85	81
Rubber Tired Dozers	2	40	85	82
Site Preparation				
Rubber Tired Dozers	3	40	85	83
Tractor, Loader, or Backhoes	4	40	84	N/A
Grading				
Excavator	1	40	85	81
Grader	1	40	85	83
Rubber Tired Dozer	1	40	85	82
Tractor, Loader or Backhoes	3	40	84	N/A
Building Construction				
Crane	1	16	85	81
Forklift (Gradall)	3	40	85	83
Generator[5]	1	50	82	81
Tractor, Loader or Backhoes	3	40	84	N/A
Welder[5]	1	40	73	74
Paving				
Paver	2	50	85	77
Paving Equipment	2	50	85	77
Rollers	2	20	85	80
Architectural Coating				
Air Compressor[5]	1	40	80	78

Notes:
[1] Acoustical use factor is the percentage of time each piece of equipment is operational during a typical workday.
[2] Spec 721.560 is the equipment noise level utilized by the RCNM program.
[3] The "slow" response averages sound levels over 1-second increments. A "fast" response averages sound levels over 0.125-second increments.
[4] Actual Measured is the average noise level measured of each piece of equipment during the Central Artery/Tunnel project in Boston, Massachusetts primarily during the 1990s.
[5] Stationary equipment, analyzed separately from the mobile equipment.
Federal Highway Administration, 2006 and CalEEMod default equipment mix.
Source: Noise Impact Analysis, Vista Environmental (Appendix K)

Section 12.08.440 of the Los Angeles County Code limits construction activities to between 7:00 a.m. and 7:00 p.m., on weekdays and Saturdays and restricts construction activities from occurring on Sundays or holidays. During the allowable times of construction, Section 12.08.440 limits mobile equipment construction noise impacts to 75 dBA and stationary equipment construction noise impacts to 60 dBA at the nearby single-family homes.

Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. The construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators.

Mobile Construction Equipment

Due to the nature of all phases of building construction, and especially demolition and grading, where the equipment will be focused on one sub-area of the project until specifications are met and then move on to the next sub-area of the project, it is not likely that mobile construction equipment would operate continuously in the direct vicinity of any nearby home. The Noise Control Ordinance regulates construction noise and the hours of operation of mobile construction equipment. As such the Noise Impact Analysis analyzed noise construction noise against the County's mobile equipment threshold of 75 dBA at the nearby single-family homes. Table NOI-2 demonstrates that mobile construction equipment would result in noise levels ranging from 71 to 73 dBA Leq at the sensitive receptors west and east of the project site, 64 to 66 dBA Leq at the single-family homes to the north of the project site, and 63 to 65 dBA Leq at the single-family homes south of the project site, all of which would be lower than the County's mobile equipment threshold of 75 dBA Leq. Therefore, impacts related to mobile construction equipment noise would be less than significant.

Table NOI-2: Mobile Construction Noise Levels at Nearby Sensitive Receptors

	Construction Noise Level (dBA Leq) at:		
Construction Phase[1]	**Single-Family Homes to West & East[2]**	**Single-Family Homes to North[3]**	**Single-Family Homes to South[4]**
Demolition	73	66	65
Site Preparation	72	65	64
Grading	72	65	65
Building Construction	73	66	65
Paving	71	64	63
County's Mobile Equipment Threshold[5]	**75**	**75**	**75**
Exceed Thresholds?	**No**	**No**	**No**

[1] Only the construction phases with mobile equipment were analyzed (i.e., painting was not analyzed since it would be limited to stationary equipment).
[2] The single-family homes on the west and east sides of the project site are located as near as 2 feet from the project site property line.
[3] The single-family homes to the north of the project site are located as near as 90 feet north of the project site property line.
[4] The single-family homes to the south of the project site are located as near as 130 feet south of the project site property line.
[5] County Mobile and Stationary Equipment Noise Thresholds were obtained from Section 12.08.440(B) of the Municipal Code.
RCNM, Federal Highway Administration, 2006
Source: Noise Impact Analysis, Appendix K

Stationary Construction Equipment

Additionally, project construction would include the use of stationary construction equipment including air compressors, generators, and welders among others. Since the project site is only 470 feet wide, which limits the placement of the stationary equipment to a maximum of approximately 235 feet from the nearest homes, the stationary construction equipment was calculated at 100 feet, 160 feet, and 200 feet distances.

Table NOI-3: Stationary Construction Noise Levels at Nearby Sensitive Receptors

Construction Equipment	Construction Noise Level (dBA Leq) at:		
	100 feet	160 feet	230 feet
Air Compressor	68	64	60
Generator	64	60	56
Welder/Torch	64	60	57
County's Stationary Equipment Threshold[1]	**60**	**60**	**60**
Exceed Thresholds?	**Yes**	**Yes/No/No**	**No**

Notes:
[1] County Stationary Equipment Noise Thresholds were obtained from Section 12.08.440(B) of the Municipal Code.
RCNM, Federal Highway Administration, 2006
Source: Noise Impact Analysis, Appendix K

As demonstrated by Table NOI-3, stationary construction equipment would result in noise levels ranging from 64 to 68 dBA Leq at distances of 100 feet from the nearest single-family residences, 60 to 64 dBA Leq at distances of 160 feet from the nearest single-family residences, and 56 to 60 dBA Leq at distances of 230 feet from the nearest single-family residences. Therefore, operation of stationary construction equipment within 100 feet from the nearby homes would exceed the County's stationary equipment threshold of 60 dBA by as much as 8 dBA. In order to reduce stationary construction equipment noise, Mitigation Measure NOI-1 is included to require a minimum 8-foot-high temporary sound blanket or sound wall to be placed next to the stationary equipment on the side of the nearest homes and that the stationary equipment shall be located a minimum of 100 feet away from any offsite residential property line.

According to the California Department of Transportation (Caltrans, 2013), a sound wall provides approximately 5 dB of attenuation at the height where it blocks the line-of-sight (4 feet high for air compressors, generators, and welders) and then an additional 0.9 dB for each additional foot of height, which would result in at least 8 dB of additional attenuation provided by an 8-foot-high sound blanket. With implementation of Mitigation Measure NOI-1, the noise levels at 100 feet would be 60 dBA for an air compressor, and 56 dBA for a generator and welder/torch, which would all be within the County's 60 dBA stationary construction noise standard. Therefore, with implementation of Mitigation Measure NOI-1, stationary construction noise impacts would be less than significant.

Operation

Once the proposed residences are constructed and inhabited , noise levels generated at the project site would occur from stationary equipment such as heating, ventilation, and air conditioning (HVAC) units that would be installed for the new development, internal street and driveway vehicle movements, trash removal activity, and activity at outdoor gathering areas. Typical noise levels from onsite operations at 50 feet from the noise source include the following:

- Air Conditioning Unit: 54.4 dBA L_{50}
- Trash Enclosure Activity: 49.0 dBA L_{50}
- Parking Lot Vehicle Movements: 33.5 dBA L_{50}
- Outdoor Community Recreation Activity: 48.7 dBA L_{50}

Typically, air conditioning units are located away from sensitive receivers and shielded to ensure that noise from operation of the units does not have the potential to result in an impact. Additionally, Los Angeles County Code Section 12.08.570 exempts outdoor activities, refuse collection vehicles, and residential air-conditioning equipment from the noise standards set forth in County Code Chapter 12.08.

The project would not result in exposure of persons to, or generation of, noise levels in excess of standards established in the County Noise Ordinance or the General Plan Noise Element. The project site is not near a

noise-generating site (e.g., airport, industrial site). The Interstate 210 Freeway (also known as the Foothill Freeway) is about 9,265 feet (1.75 miles) from the project site. The project would conform to Title 12 Chapter 12.08 ("Noise Control Ordinance") of the Los Angeles County Code, which provides a maximum exterior noise level of 45 decibels (dB) between 10:00 p.m. and 7:00 a.m. (nighttime) and 50 dB from 7:00 a.m. to 10 p.m. (daytime) in Noise Zone II (residential areas). The project site will not create noise in excess of these limits, nor will residents of the project be exposed to noise in excess of these limits. Therefore, impacts would be less than significant.

Offsite Traffic Noise

The proposed project would generate traffic related noise from vehicles traveling to and from the project site. To identify the potential of traffic from the proposed project to generate noise impacts, modeling of vehicular noise on area roadways was conducted by the Noise Impact Analysis (Appendix K). The tables below provide a summary of the exterior traffic noise levels for the area roadway segments in without and with project conditions.

Existing Year with Project Conditions. Since, neither the General Plan nor the County Code provide any policies or regulation defining what constitutes a "substantial permanent increase to ambient noise levels", the noise increase thresholds developed by the Federal Transit Administration for a moderate impact have been utilized, which determined a significant impact would occur if a project would increase the noise by 3 dB, where the ambient noise level is 55 dB or less, 2 dB, where the ambient noise level is between 55 and 60 dBA CNEL, or would increase the noise by 1 dB, where the ambient noise level is between 60 and 75 dBA CNEL. In the existing year with project conditions (Table NOI-4) noise would range from 62.5 to 67.1 dBA CNEL. Implementation of the proposed project would generate a noise level increase of up to 0.1 dBA CNEL on the study area roadway segments, which is less than the 1 and 2 dBA CNEL thresholds. Thus, offsite traffic noise impacts in the opening year plus project condition would be less than significant.

Table NOI-4: Existing Year with Project Off-Site Traffic Noise

		dBA CNEL at Nearest Receptor				
Roadway	**Segment**	**Existing**	**Existing Plus Project**	**Project Increase**	**Increase Threshold**	**Exceed Threshold?**
Irwindale Avenue	North of San Bernardino Avenue	65.5	65.5	+0.0	+1 dBA	**No**
Irwindale Avenue	South of San Bernardino Avenue	65.7	65.8	+0.1	+1 dBA	**No**
Vincent Avenue	North of San Bernardino Avenue	66.2	66.2	+0.0	+1 dBA	**No**
Vincent Avenue	South of San Bernardino Avenue	66.3	66.4	+0.1	+1 dBA	**No**
San Bernardino Avenue	West of Irwindale Avenue	62.5	62.5	+0.0	+2 dBA	**No**
San Bernardino Avenue	West of Project Driveway	62.7	62.8	+0.1	+2 dBA	**No**
San Bernardino Avenue	East of Project Driveway	67.0	67.1	+0.1	+1 dBA	**No**
San Bernardino Avenue	East of Vincent Avenue	65.5	65.5	+0.0	+1 dBA	**No**

Source: Noise Impact Analysis, Appendix K

Opening Year (2023) with Project Conditions. In the opening year (2023) (if the project is constructed and the residential units are occupied by 2023) with project conditions (Table NOI-5) noise would range from 62.7 to 67.3 dBA CNEL. Implementation of the proposed project would generate a noise level increase of up to 0.1 dBA CNEL on the study area roadway segments, which is less than the 1 and 2 dBA CNEL thresholds. Thus, off-site traffic noise impacts in the opening year plus project condition would be less than significant. This topic will not be further evaluated in the EIR.

Table NOI-5: Opening Year (2023) with Project Off-Site Traffic Noise

		dBA CNEL at Nearest Receptor				
Roadway	Segment	2023 No Project	2023 Plus Project	Project Increase	Increase Threshold	Exceed Threshold?
Irwindale Avenue	North of San Bernardino Avenue	65.6	65.6	+0.0	+1 dBA	No
Irwindale Avenue	South of San Bernardino Avenue	65.8	65.9	+0.1	+1 dBA	No
Vincent Avenue	North of San Bernardino Avenue	66.5	66.5	+0.0	+1 dBA	No
Vincent Avenue	South of San Bernardino Avenue	66.6	66.6	+0.0	+1 dBA	No
San Bernardino Avenue	West of Irwindale Avenue	62.7	62.7	+0.0	+2 dBA	No
San Bernardino Avenue	West of Project Driveway	62.9	63.0	+0.1	+2 dBA	No
San Bernardino Avenue	East of Project Driveway	67.2	67.3	+0.1	+1 dBA	No
San Bernardino Avenue	East of Vincent Avenue	65.7	65.7	+0.0	+1 dBA	No

Source: Noise Impact Analysis, Appendix K

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☒ ☐ ☐

Less than Significant with Mitigation.

Construction

Construction activities would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

Demolition, excavation, and grading activities are required for implementation of the project and can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Based on the reference vibration levels provided by the Federal Transit Administration (FTA), a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 feet.

Section 12.08.570 of the County Code exempts construction activities from the vibration standards, provided construction activities occur between 7:00 a.m. and 7:00 p.m. on weekdays, excluding holidays. In order to analyze the vibration source levels, Caltrans standards have been utilized, which defines the threshold of perception from transient sources that include mobile construction equipment to 0.25 inch per second PPV.

Table NOI-6: Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second)	Approximate Vibration Level (L_v)at 25 feet
Clam shovel drop (slurry wall)	0.202	94
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Noise Impact Analysis, Appendix K

At distances of 25 feet from construction, vibration levels are anticipated to range from 0.003 to 0.21 in/sec PPV, as shown on Table NOI-6. These vibration levels would not be sustained during the entire construction period but would occur only during the times that heavy construction equipment is operating in the vicinity of the sensitive receivers. Based on typical propagation rates, the vibration level at the nearest sensitive receptors (two (2) feet away from the proposed project) would be 1.43 inch per second PPV, which would exceed the Caltrans distinctly perceptible vibration level of 0.25 inch per second PPV for transient sources.

Mitigation Measure NOI-2 is provided to restrict any off-road equipment with 150 horsepower engine or greater from operating within ten (10) feet of either the east or west property lines. Based on typical propagation rates, the vibration level at the nearest homes (12 feet away from proposed construction activities with implementation of Mitigation Measure NOI-2) would be 0.03 inch per second PPV, which is within the 0.25 inch per second PPV threshold. Therefore, with implementation of Mitigation Measure NOI-2, construction-related vibration impacts would be less than significant.

Operation

Inhabitation of the proposed single-family uses would include heavy trucks for residents moving in and out of the residential units and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, typical vibration levels for the heavy truck activity at normal traffic speeds would be approximately 0.006 in/sec PPV, based on the FTA Transit Noise Impact and Vibration Assessment. Truck movements on site would be travelling at very low speed, so it is expected that truck vibration at nearby sensitive receivers would be less than the vibration threshold of 0.08 in/sec PPV for fragile historic buildings and 0.04 in/sec PPV for human annoyance, and therefore, would be less than significant. This topic will not be further analyzed in the EIR.

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

No Impact. The proposed project is not within an airport land use plan or within the vicinity of a private airstrip. The project site is located approximately 5.5 miles to the east of the San Gabriel Airport, which is the closest public airport. Due to the distance from the San Gabriel Airport, the project would not expose people residing in the project area to excessive noise levels from aircraft. Therefore, no impacts would occur, and this topic will not be further evaluated in the EIR.

Plans, Programs, and Policies,

None.

Mitigation Measures

Mitigation Measure NOI-1: Construction plans and specifications shall require that a minimum 8-foot-high temporary sound barrier (e.g., fiberglass core sound blanket or a 0.5-inch thick wooden panel sound wall) shall be placed on the property lines nearest the offsite homes to any stationary equipment (i.e., air compressors, generators, and welders) to be utilized onsite during construction of the proposed project. Construction plans and specifications shall also state that stationary construction equipment shall be located a minimum of 100 feet from the property line of any offsite residence. Noise control requirements shall be noted and depicted on project construction drawings/plans.

Mitigation Measure NOI-2: The project construction plans and specifications shall state that operation of off-road construction equipment that is 150 horsepower or greater shall not occur within 10 feet of either the east or west property lines in order to limit construction-related vibration levels at the nearby residences. Typical construction equipment that is less than 150 horsepower include backhoes, skid steers, skip loaders, and tractors, that are capable of performing all grading and excavation activities within the 10-foot wide areas adjacent to the east and west property lines. Noise control requirements shall be noted and depicted on project construction drawings/plans.

14. POPULATION AND HOUSING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

Less than Significant Impact. The project would involve the demolition of existing, vacant school buildings on the project site and development of 68 single-family residences, common open spaces, drainage and utility infrastructure, and new private shared driveways.

Based on the California Department of Finance data, with an estimate of 2.99 persons per household within Los Angeles County (CDF 2020), the proposed project would result in a net increase of approximately 204 new residents. Overall, the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy's (2020-2045 RTP/SCS) population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,500 additional persons, yielding an approximately 20.4% growth rate. The unincorporated areas of Los Angeles are projected to have a population of 1,258,000 persons and 419,300 housing units by 2045. The proposed project would generate approximately 204 persons, which represents approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. Thus, the proposed increase in housing units and population as a result of the proposed project is within SCAG's 2020-2045 RTP/SCS growth forecast.

Furthermore, the proposed project is located in an urbanized residential area of unincorporated Los Angeles County and is surrounded by residential uses. The proposed project does not propose to expand surrounding utility infrastructure (e.g., water, electricity, cell tower, gas, sanitary sewer, and stormwater drains) in the project vicinity. The project would be served by new onsite sewer main lines that would be maintained by the Los Angeles County Consolidated Sewer Maintenance District, as provided by the sewer will serve letter dated August 14, 2020, and each residence would be served by a separate house lateral, which would be maintained by the property owner. In addition, vehicular access would be provided by new private shared driveways from San Bernardino Road. Because the project proposes development in an already built-out neighborhood, it would not indirectly induce population growth through the extension of roads or other infrastructure. In addition, the proposed project would not create employment opportunities that could induce population growth.

The increase in population resulting from the proposed project would be within the planned population estimates for the unincorporated area of Los Angeles County. Additionally, the project would not install infrastructure that would facilitate additional growth within the County. Therefore, potential impacts related to inducement of unplanned population growth, either directly or indirectly, would be less than significant. As such, this topic will not be further evaluated in the EIR.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. The existing project site does not provide any residential uses. Therefore, the proposed project would not displace a substantial number of existing people and would also provide 68 new residential units on the project site. With construction of the additional housing units, replacement housing would not need to be constructed elsewhere. Therefore, there would be no impacts related to the displacement of substantial numbers of existing people or housing. This topic will not be further evaluated in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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:				
Fire protection?	☐	☐	☒	☐

Less than Significant Impact. Fire protection and emergency medical services in the County of Los Angeles are provided by the Los Angeles County Fire Department (LACoFD) from 175 fire stations. There are currently five (5) county operated fire stations located within 3.5 miles of the project site. Station 48, which is located 1.3 miles from the project site is the first responding unit. The location, equipment, and staffing of the fire stations near the project site are provided in Table PS-1.

LACoFD's average response time for on-scene services is approximately five (5) minutes and their standard is to arrive on scene within 30 minutes.[1] Station 48, which is located 1.3 miles from the project is the first responding station to the site. Station 48 would have an on-scene response time of approximately four (4) to five (5) minutes to the project site.[1]

Table PS-1: Los Angeles County Fire Stations Near the Project Site

Fire Station	Location	Distance from Site	Equipment	Staffing
Station 48	15546 E. Arrow Hwy Irwindale, CA 91706	1.3 miles	2 Fire Engines	3 Fire Captains, 3 Engineers, 6 Firefighters
Station 152	807 W. Cypress St. Covina, CA 91723	1.4 miles	1 Fire Engine	3 Fire Captains, 3 Engineers, 3 Firefighters
Station 29	14334 E. Los Angeles St. Baldwin Park, CA 91706	1.8 miles	1 Fire Engine 1 Ladder Truck 1 Paramedic Squad	6 Fire Captains, 6 Engineer, 15 Firefighters
Station 154	401 N. Second Ave. Covina, CA 91723	2.4 miles	1 Fire engine 1 Paramedic Truck	3 Fire Captains, 3 Engineers, 9 Firefighters
Station 32	605 N. Angeleno Ave. Azusa, CA 91702	3.1 miles	1 Paramedic Squad 1 Front Line Tender 1 Fire Engine	3 Fire Captains, 3 Engineers, 3 Firefighters, 9 Paramedics

Source: LACoFD 2020.

[1] Personal communication with Firefighter Mackenzie via phone, Los Angeles County Fire Department Station 48, 22 April 2021.

Construction of the proposed project and inhabitation of the proposed residences would increase demands for fire protection and emergency medical services. As described previously, the proposed project is anticipated to result in 204 residents. This residential population is expected to create the typical range of service calls to LACoFD that are largely related to medical emergencies, which consist of 83.7 percent of service calls, while fire calls consisted of 1.8 percent of LACoFD service calls during 2019 (Los Angeles County Fire Department 2019 Statistical Summary).

The calls for service from the additional population at the project site could result in an increase in response times if the calls coincide with other calls for service. Because the project site is within 3.5 miles of five (5) existing fire stations and the project site is within a developed area that is currently served by these stations, the project would not result in the requirement to construct a new fire station.

Additionally, the proposed project would remove the existing school, which was constructed pursuant to fire code standards of 1953, and develop new building structures pursuant to the most recent California building and fire codes, which would improve the structural fire safety over the existing buildings. As all projects within the County, the proposed project would be required to comply with existing regulations within the Los Angeles County Fire Code. The project would require the installation of various fire protection systems, including sprinkler systems. Therefore, with implementation of the California building and fire codes, impacts related to fire protection services would be less than significant, and this topic will not be further evaluated in the EIR.

Sheriff protection? ☐ ☐ ☒ ☐

Less than Significant Impact. The Los Angeles County Sheriff Department (LASD) provides law enforcement and protection services in unincorporated Los Angeles County, including the project area. The project site would be served by the San Dimas Sheriff's Station, which is located approximately 8.1 roadway miles from the project site. The San Dimas Sheriff's station serves the areas of City of San Dimas, Unincorporated Communities of: Covina, Azusa, Glendora, La Verne, Claremont, Azusa Canyon, Mount Baldy, and Angeles National Forest (State Route 39).

In 2020, the San Dimas Sheriff's Station had 137 personnel which includes sworn and non-sworn positions. Based on the LASD's 2019 Synopsis, the total population of the area served by the San Dimas Sheriff's Station was 84,240 people. The San Dimas Station's officer to population ratio is approximately 1.63 officers per 1,000 population.

LASD generally adheres to the following, widely accepted industry standard among law enforcement agencies for responding to emergent, priority, and routine calls for service: ten minutes, twenty minutes, and sixty minutes, respectively. The San Dimas Station is estimated to have the following average response times to calls for service at the project site: 6.2 minutes for emergent, 12.4 minutes for priority, and 31.9 minutes for routine calls[2].

As described previously, the residential population of the project site would be approximately 204 residents and based on the Sheriff Department's 2019 staffing of 1.63 officers per thousand population, the proposed project would not require any additional officers. Furthermore, the project site is part of an existing patrol area covered by the Los Angeles County Sheriff's Department.

[2] Personal communication with Sergeant Matthew Bodell via email, San Dimas Station Operations, April 22, 2021

Therefore, with existing personnel at the San Dimas Sheriff's Station, law enforcement personnel are anticipated to be able to respond in a timely manner, and within set standard response times, to emergency calls in the project area. Therefore, the proposed project should not result in the need for, new or expansion of police protection facilities. Thus, substantial adverse physical impacts associated with the provision of new or expanded facilities would not occur. Thus, impacts are less than significant.

Schools? ☐ ☐ ☒ ☐

Less than Significant Impact. The project site is located within the Covina Valley Unified School District (CVUSD) boundary, which serves the communities of Covina, West Covina, Glendora, San Dimas, and Irwindale and has a total of 18 schools, including: nine elementary schools, three middle schools, and four high schools, one children's center, and one nonpublic, nonsectarian school. The schools that serve the site are listed below:

- Manzanita Elementary School located at 4131 North Nora Ave, Covina, CA 91722, which is approximately 0.3 miles from the project site;
- Las Palmas Middle School located at 641 North Lark Ellen Ave, Covina, CA 91722, which is approximately 0.5 miles from the project site; and
- Northview High School located at 1016 West Cypress Street, Covina, CA 91722, which is approximately 1 mile from the project site.

Table PS-2: School Enrollment Between 2019-20 and 2013-14

School	2019-20	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14
Manzanita Elementary School	418	371	299	252	235	256	N/A
Las Palmas Middle School	805	860	900	878	844	870	926
Northview High School	1,265	1,247	1,274	1,314	1,333	1,346	1,388

Source: California Department of Education.

The Covina Valley Unified School District (CVUSD) uses the State's Student Yield Factor for Unified School Districts, which is 0.7 students per dwelling unit (Office of Public School Construction 2009). Using this factor, the proposed 68 residences could result in approximately 48 new students that would range in age from elementary through high school.

While development of the new residential units would increase the number of students, this increase would be accommodated by the existing schools. As described above in Table PS-2, the enrollment for the schools serving the project site ranged by 183 students in the elementary school, 121 students in the middle school, and 141 students in the high school (numbers derived by subtracting the highest enrollment year by the lowest enrollment year) between the 2019-2020 and the 2013-2014 school years (CDE 2020). Furthermore, none of the schools serving the project site are near their capacity limits according to the CVUSD. Thus, the 48 new students generated from the proposed project would be accommodated by existing school facilities.

In addition, the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's

impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for commercial, office, and residential projects. Pursuant to Government Code Section 65995, applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments. This topic will not be further analyzed in the EIR.

Parks? ☐ ☐ ☒ ☐

Less than Significant Impact. The proposed open space and recreation area on the project site and the facilities provided by the Los Angeles County Department of Parks and Recreation would provide park services to the proposed project. According to the 2016 Countywide Comprehensive Parks and Recreation Needs Assessment, the most recent park needs assessment, there are 3.3 acres of local and regional recreation park per 1,000 residents, which is less than the 4.0 acres per 1,000 goal included in the Los Angeles County General Plan. For regional open space and natural areas, there are 86.2 acres per 1,000 people countywide. The parks closest to the project site include the following:

- Santa Fe Dam Recreation Area, which is located approximately 1.5 miles from the project site. This County regional park is 989 acres.
- Valleydale Park, which is located approximately 1.5 miles from the project site. This County local park is 9 acres.

The project would be required to pay parkland fees in compliance with County Code Section 21.28.140. With provision of onsite recreational amenities and payment of park fees, the project would not result in significant environmental impacts related to parks. Therefore, this topic will not be further evaluated in the EIR.

Libraries? ☐ ☐ ☒ ☐

Less than Significant Impact. The Los Angeles County Public Libraries would provide library services to the project via the West Covina Library, located approximately 1.49 miles southwest of the project site, and the Baldwin Park Library, located approximately 2.04 miles west of the project site. The project would be required to pay library facilities mitigation fees at set forth in County Code Section 22.246.060. Payment of these applicable fees would serve to minimize impacts to library services. As such, impacts related to library services would be less than significant. Therefore, this topic will not be further evaluated in the EIR.

Other public facilities? ☐ ☐ ☒ ☐

Less than Significant Impact. The project is not expected to result in significant demand for other public facilities or services. The project is not perceived to create capacity or service level problems or result in substantial adverse physical impacts for any other public facility. As such, the project would not significantly adversely affect other public facilities or services, and therefore would not require the construction of new or modified public facilities. Less than significant impacts would occur to other public facilities, and this topic will not be further analyzed in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

16. RECREATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Less than Significant Impact. According to the 2016 Countywide Comprehensive Parks and Recreation Needs Assessment, there are 3.3 acres of local and regional recreation park per 1,000 residents, which is less than the 4.0 acres per 1,000 goal included in the Los Angeles County General Plan. For regional open space and natural areas, there are 86.2 acres per 1,000 people countywide.

As discussed in Response 15(a) above, the Santa Fe Dam Recreational Area and Valleydale Park are approximately 1.5 miles from the project site. The project-related increase in population could incrementally increase the use of existing parks within unincorporated areas of the County. The County's standard for the provision of parkland is 4 acres of local parkland per 1,000 residents, and the Los Angeles County Code Section 21.28.140 requires the developer of a residential subdivision to mitigate recreational impacts by dedicating park space, paying an in-lieu fee, or doing a combination of the two. The project would provide approximately 35,780 square feet of onsite recreational amenities. Residents are anticipated to utilize the onsite open space to a greater degree than offsite facilities due to convenience and proximity. In this way, the project's provision of onsite open space would reduce the use of area parks by project residents. Nevertheless, some project residents would still be expected to utilize other public recreational facilities. As a result, the proposed project would create a limited incremental increase in the use of area parks.

Overall, the project would be subject to the County's Code to provide local park space or pay a fee in lieu of the provision of park space, which would be used for the purpose of acquiring, developing, improving and expanding open space and park lands. Therefore, due to the limited increase in residents near existing park and recreational facilities, and compliance with Section 21.24.350 of the County's Code, the project's contribution to deterioration of parks and recreational facilities would be less than significant and no mitigation would be required. Therefore, this topic will not be further analyzed in the EIR.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Less than Significant Impact. The proposed project would include 35,780 square feet of recreational amenities, 62,443 square feet of designated common open space, and 72,719 square feet of private open space within the project site. The potential adverse effects associated with implementation of the proposed project, including development of the proposed recreational areas, have been considered. Development of the open space area would not have any potentially significant impacts. The project will be required to pay parkland fees in compliance with County Code Section 21.28.140 to satisfy park obligation. Therefore, the proposed

project does not include recreational facilities that would have an adverse physical effect on the environment. As such, this topic will not be further evaluated in the EIR.

c) Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

No Impact. The proposed project would not interfere with regional open space connectivity. There are no regional trails within the project vicinity. The recreational areas provided by the proposed project would not interfere with any regional open space connectivity. Therefore, project impacts related to open space connectivity would not occur.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

17. TRANSPORTATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐

Potentially Significant Impact. Implementation of the project would result in both short-term construction traffic and long-term traffic from the development. The proposed residences have the potential to result in a significant impact on area roadways by conflicting with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. A traffic impact analysis will be prepared to assess existing traffic conditions, forecast traffic volumes, and trip distribution generated by the project, and forecast future traffic conditions with and without project buildout. A description of the existing and planned transit in the local and regional area will also be provided. In addition, the existing bicycle and proposed pedestrian facilities will be detailed. Therefore, potential impacts from the project related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities will be evaluated in the EIR.

b) Conflict or be inconsistent with Guidelines for California Environmental Quality Act Section 15064.3 (b)?	☒	☐	☐	☐

Potentially Significant Impact. CEQA Guidelines Section 15064.3(b) provides criteria for analyzing transportation impacts. For land use projects, such as the proposed project, CEQA Guidelines Section 15064.3(b) states that vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. In addition, it states the analysis shall include evaluation of factors such as the availability of transit, proximity to destinations, etc.

Implementation of the project would generate additional vehicle miles traveled and may have the potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). Therefore, a traffic impact analysis will be prepared to assess potential impacts related to conflicts or inconsistency with CEQA Guidelines Section 15064.3(b), and impacts will be evaluated in the EIR.

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

Less than Significant Impact. Project implementation would not add incompatible uses to area roadways. The project will be subject to the requirements and design standards of the Department of Public Works. The project will not create a roadway hazard. Thus, impacts would be less than significant, and this topic will not be further analyzed in the EIR.

d) Result in inadequate emergency access?	☐	☐	☐	☒

No Impact. Project development would not result in inadequate emergency access. Direct access to the project site would be provided by a new private roadway intersecting with San Bernardino Road. The project would also be required to construct internal access and provide fire suppression facilities, including three fire hydrants, in conformance with the County Code Title 32, Fire Code. The project will be subject to all requirements of the Fire Department and shall comply pursuant to the requirements of the Uniform Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, project implementation would not result in inadequate emergency access, and this topic will not be further analyzed in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
Will be discussed and provided in the EIR.

18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or	☐	☒	☐	☐

Less than Significant Impact with Mitigation.

AB 52 Requirements

The Project would be required to comply with AB 52 and SB 18 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

In compliance with these requirements, on July 15, 2021, the County sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the project vicinity.

- Gabrieleno Tongva, San Gabriel Band of Mission Indians
- Gabrieleno Band of Mission Indians-Kizh Nation

Additionally, on July 22, 2021, the County requested a Sacred Lands File (SLF) search from the Native American Heritage Commission. On August 19, 2021, the NAHC responded that the SLF search yielded negative results for known tribal cultural resources or sacred lands within a 1-mile radius of the Project site. The Gabrieleno Band of Mission Indians-Kizh Nation requested consultation regarding the proposed project. The Gabrieleno Band of Mission Indians-Kizh Nation considers the area sensitive for cultural resources as several sites are located nearby. As such, the consulting tribes requested inclusion of mitigation due to the potential of the project to unearth previously undocumented tribal cultural resources during construction. With implementation of Mitigation Measures TCR-1 through TCR-3, impacts to tribal cultural resources would be less than significant.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in	☐	☒	☐	☐

subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact with Mitigation. As discussed above, to avoid potential adverse effects to tribal cultural resources, Mitigation Measures TCR-1 through TCR-3 have been included to provide for Native American monitoring of excavation and grading activities to avoid potential impacts to tribal cultural resources that may be unearthed by project construction activities. There are no known tribal cultural resources on or adjacent to the Project site, and no potentially significant impacts are anticipated. The following mitigation measures are included in the event of any inadvertent discoveries during grading and construction activities.

Additionally, as described previously, Mitigation Measure TCR-2 and California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact the Native American Heritage Commission. Therefore, with implementation of Mitigation Measures TCR-1 through TCR-3, impacts to TCRs would be less than significant.

Plans, Programs, and Policies,
None.

Mitigation Measures

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

A. The project applicant/owner shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
D. On-site tribal monitoring shall conclude upon (1) written confirmation to the Kizh from a designated point of contact for the project applicant/owner that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)
E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.
F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3: Procedures for Burials and Funerary Remains

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.
B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed

over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed, as described in item E.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

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

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

19. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. Domestic water services are provided to the project site by Azusa Light and Water, and wastewater treatment services are provided to the area by the Los Angeles County Sanitation Districts ("Districts"). The project would install new water and sewer infrastructure on the site and connect to the new 8-inch water main and 8-inch sewer main in San Bernardino Road. As per the Will Serve Letter provided by Azusa Light and Water, dated March 18, 2020, the project would install a new 8-inch water main in San Bernardino Avenue as a condition of approval (ALW, 2020).

Per the sewer will serve letter for the project, dated August 14, 2020, from the Los Angeles County Sanitation District, Districts has capacity to serve the project. Per the City of West Covina's Sewer Outlet Approval Letter, dated December 3, 2020, the project applicant would be required to pay in-lieu fees due to the City's 8-inch sewer in East San Bernardino Road being over-capacity; this sewer line will service the project. As such, Mitigation Measure UT-1 is included to require the project to pay all applicable in-lieu fees to the City of West Covina.

In addition, the project applicant would construct onsite storm water drainage facilities that would convey storm water into two onsite infiltration basins along San Bernardino Road. Runoff from properties adjacent to the project site will be directly conveyed in a culvert to the stormwater drain in San Bernardino Road. The project would also connect to existing electric power, natural gas, and telecommunication facilities. Therefore, the project would not result in the relocation or construction of new or expanded wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities that could cause environmental effects. Additionally, the construction of the new 8-inch water main would serve to replace the existing water main and would only serve the proposed project and surrounding, existing developments. Thus, with inclusion of MM UT-1, impacts would be less than significant, and this topic will not be further analyzed in the EIR.

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

Less than Significant Impact. Azusa Light and Water is responsible for supplying potable water to the project site and its region. Azusa Light and Water's water supplies consist of local groundwater, local surface water, and imported water. Azusa Light and Water's service area includes the City of Azusa and portions of Covina, Glendora, Irwindale, West Covina, and portions of unincorporated Los Angeles County.

The 2015 Azusa Light and Water's Urban Water Management Plan (UWMP) details that Azusa Light and Water has adequate supplies to serve its customers during normal, dry year, and multiple dry year demand

through 2040 with projected population increases and accompanying increases in water demand. Furthermore, Azusa Light and Water forecasts for water demand are based on population projections of SCAG, which rely on adopted land use designations contained within the general plans that cover the geographic area. Implementation of the project would not change the land use designation or zoning of the project site. The UWMP assumes a 2020 water demand of 168 gallons per capita per day. As described previously, in the population and housing discussion, the project would result in approximately 204 new residents. Thus, the project would generate a demand of approximately 34,272 gallons of water per day or 38.4 acre-feet per year, which is within the anticipated increased demand and supply for water. Additionally, this is a conservative estimate because Azusa Light and Water's actual water use during FY 2014-15 was 142 gallons per capita per day. Redevelopment of the project site would also be required to be compliant with CalGreen/Title 24 requirements for low flow plumbing fixtures and irrigation, which would provide for efficient water use.

Furthermore, the UWMP states that due to Azusa Light and Water's diverse water supply portfolio, water supplies may be re-apportioned during multiple dry years to meet Azusa Light and Water's water demands, and that a single dry year or a multiple dry year period will not compromise Azusa Light and Water's ability to provide a reliable supply of water to its customers. Additionally, per the will serve letter dated March 18, 2020, Azusa Light and Water's has capacity to serve the proposed project. Therefore, Azusa Light and Water has sufficient water supplies available to serve the project during normal, dry and multiple dry years, and impacts would be less than significant. Therefore, potential impacts related to water demand will not be further evaluated in the EIR.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Less than Significant Impact. Based on the Los Angeles County Sanitation sewage flow generation rate of 260 gallons per day of wastewater per single-family residence, the project would result in generation of 17,680 gallons per day of wastewater. Wastewater generated from the project site would be treated by the Los Angeles County Sanitation Districts (LACSD), which convey wastewater from the project site to the San Jose Creek Water Reclamation Plant. The San Jose Creek Water Reclamation Plant provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day (mgd) (LACSD). Per the sewer will serve letter for the project, dated August 14, 2020, the Los Angeles County Sanitation Districts has capacity to serve the project (LACSD, 2021). The San Jose Creek Water Reclamation Plant currently processes an average flow of 58.5 mgd of wastewater, resulting in a remaining capacity of approximately 41.5 mgd of wastewater. This remaining capacity is adequate to serve the project and the project would not result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Thus, impacts would be less than significant, and this issue will not be evaluated further in the EIR.

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. In 2019, a majority of the solid waste from the unincorporated area of Los Angeles County, where the project site is located, that was disposed of in landfills, went to the Mid-Valley Sanitary Landfill. The Mid-Valley Sanitary Landfill is permitted to accept 7,500 tons per day of solid waste

and is permitted to operate through April 2033. In December 2019, the facility received an average of 5,000 tons per day. Thus, the facility had additional capacity of 2,500 tons per day (CalRecycle).

Project construction would generate solid waste for landfill disposal in the form of demolition debris from the existing buildings and infrastructure that would be removed from the site. Construction waste in the form of packaging and discarded materials would also be generated by the proposed project. Demolition would result in 3,715 tons of debris. However, Section 5.408.1 of the 2019 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be 1,300 tons of debris. As the Mid-Valley Sanitary Landfill had additional capacity of 2,500 tons per day, the facility would be able to accommodate the addition of solid waste during construction of the proposed project.

Project includes development of 68 residential units, which is anticipated to result in approximately 204 residents, as described previously in the population and housing discussion. Based on the default CalEEMod solid waste generation rate of 0.41 ton per year per resident, the 204 residents are estimated to generate 83.64 tons of solid waste per year (or 1.61 tons per week). Overall, operation of the project is anticipated to generate 1.61 tons (3,216 pounds) of solid waste per week.

However, pursuant to AB 341, at least 75 percent of the solid waste is required to be recycled, which would reduce the volume of landfilled solid waste to approximately 0.40 ton (800 pounds) per week. As the Mid-Valley Sanitary Landfill had additional capacity of 2,500 tons per day tons per day, the facility would be able to accommodate the addition of 0.40 tons of solid waste per week from the proposed project. Thus, impacts related to solid waste generation and landfill capacity would be less than significant and would not be further analyzed in the EIR.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

No Impact. Implementation of the project would result in new development that would generate an increased amount of solid waste. All solid waste-generating activities within the County are subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Development of the project would be consistent with all state and County regulations, and impacts would not occur. Impacts related to solid waste regulations will not be evaluated further in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures

Mitigation Measure UT-1: Prior to the issuance of building permits, per the will serve letter dated December 3, 2020, the project applicant shall pay all applicable in-lieu sewer upgrade fees to the City of West Covina.

20. WILDFIRE

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

No Impact. The project site is bordered by San Bernardino Road to the south, residential uses to the east and west, and a railway easement to the north. The project would be accessed from proposed private roads from San Bernardino Road. According to the CAL FIRE Fire Hazard Severity Zone Map, the project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (CAL FIRE 2020).

The project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and inhabitation of the proposed residences, the project would be required to maintain adequate emergency access for emergency vehicles via project roadways as required by the County. Furthermore, the project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. Therefore, implementation of the project would not impact an adopted emergency plan or emergency evacuation plan within or near a very high fire hazard severity zone. Wildfire risks will not be further evaluated in the EIR.

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?	☐	☐	☐	☒

No Impact. As described in the previous response, the project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (CAL FIRE 2020). Adjacent areas to the project site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks and result in exposure of persons to pollutant concentrations from a wildfire. Thus, impacts will not be further evaluated in the EIR.

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?	☐	☐	☐	☒

No Impact. As described in the previous responses, the project site is not within a Very High Fire Hazard Severity Zone, and development of the project does not include infrastructure that could exacerbate fire risks. The project site is located within an urban setting and wildfire risks will not be further evaluated in the EIR.

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? ☐ ☐ ☐ ☒

No Impact. As described in the previous responses, the project site is not within a Very High Fire Hazard Severity Zone. In addition, the project site is located in a flat area that does not contain or is adjacent to large slopes, and the project would not generate large slopes. Furthermore, project buildout includes installation of onsite and off-site drainage facilities to limit impacts. Thus, the project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires, and wildfire risks will not be further evaluated in the EIR.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☐ ☒

No Impact. As discussed in the previous responses, the project site is not within a Very High Fire Hazard Severity Zone. Implementation of the project would not introduce people or structures to a fire hazard severity zone. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires and no impacts would occur. As such, wildfire risks will not be further evaluated in the EIR.

Plans, Programs, and Policies,
None.

Mitigation Measures
None.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

Potentially Significant Impact. Based on the discussion in Section 4, *Biological Resources*, the proposed project is anticipated to result in less than significant impacts related to habitat, wildlife species, and/or plant and animal communities. The proposed project would not eliminate a plant or animal community, nor would it substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As described in Section 5, *Cultural Resources*, the project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource. In addition, as described previously, the project site has been previously disturbed from various past uses that involve farming, grading, and installation of utility infrastructure. However, the project site has a low to moderate level of sensitivity for archaeological resources. Therefore, Mitigation Measure CUL-1 is included to require retention of an archaeologist for monitoring during initial grubbing and scraping and provide spot check throughout project ground disturbing activities. With implementation of Mitigation Measure CUL-1, impacts to archaeological resources would be less than significant.

The project has the potential to eliminate important examples of the major periods of California prehistory if it were to impact tribal cultural resources. Therefore, impacts related to tribal cultural resources will be detailed in the EIR.

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)?	☒	☐	☐	☐

Potentially Significant Impact. The project is located within the Covina area of unincorporated Los Angeles County, which has a number of ongoing development projects, including residential, e-commerce, industrial, and commercial projects. Cumulative impacts are defined as two or more individual effects that, when

considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

a. Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
b. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Implementation of the project would have the potential to result in cumulative impacts to transportation and tribal cultural resources. Impacts related to other cultural resources, hazards and hazardous materials, and noise would be mitigated to a less than significant level and would not cumulatively combine to become significant. The extent and significance of potential cumulative impacts related to tribal cultural resources and transportation resulting from the combined effects of project implementation, plus other past, present, and reasonably foreseeable future projects would be evaluated in the EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ☒ ☐ ☐ ☐

Potentially Significant Impact. Redevelopment of the project site through implementation of the proposed project could directly or indirectly cause substantial adverse effects on human beings if not properly mitigated. Project implementation could result in impacts to transportation that could result in adverse effects on human beings. Therefore, these impacts would be addressed in the EIR.

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LIST OF TABLES, FIGURES, AND APPENDICES

TABLES

APPENDICES –

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PROJECT FIGURES

Conceptual Site Plan

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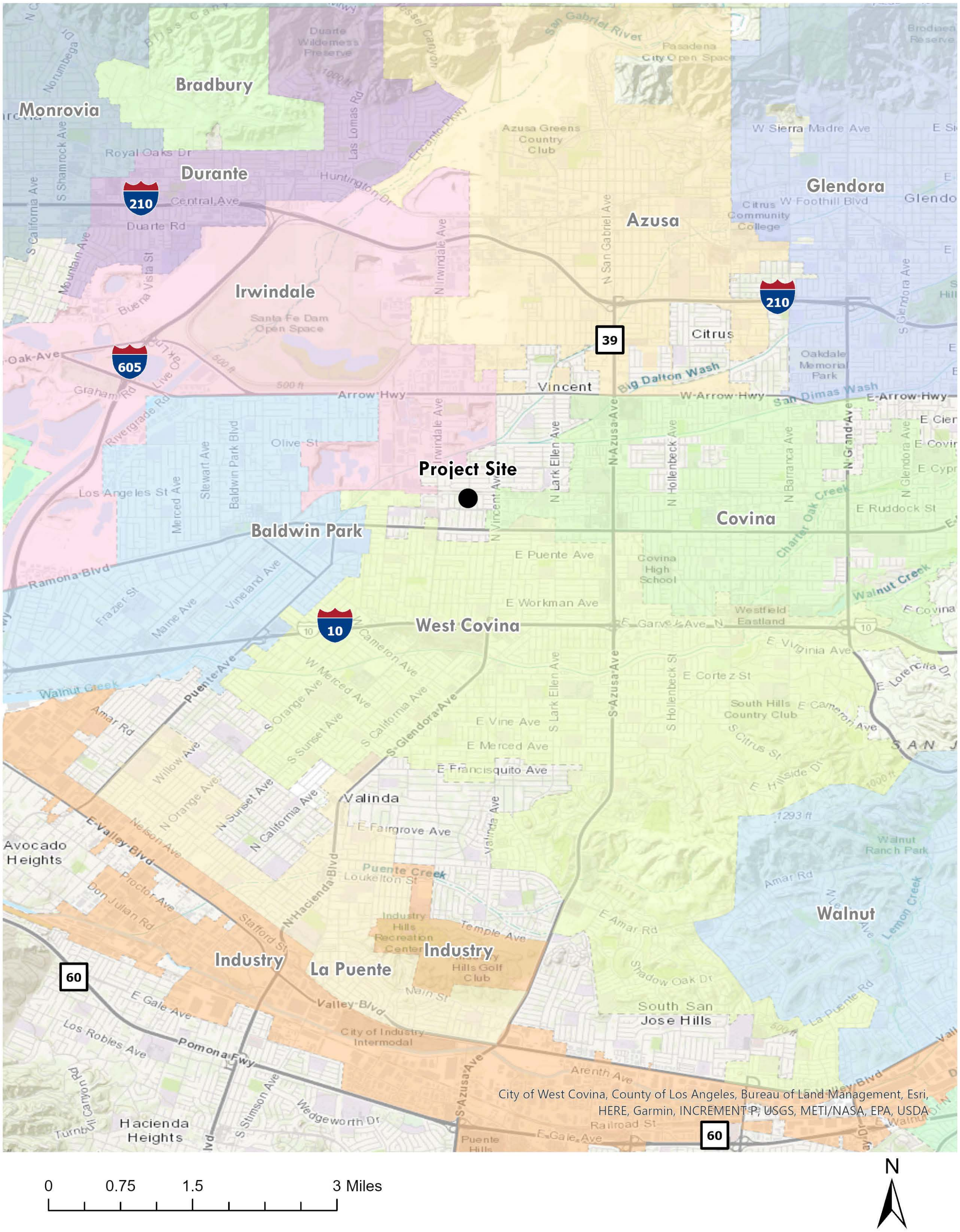
Reginal Map


Monrovia
Bradbury
Durante
Irwindale
Azusa
Glendora
Citrus
Vincent
Project Site
Baldwin Park
Covina
West Covina
Valinda
Walnut
Industry
La Puente
Avocado Heights
South San Jose Hills
Hacienda Heights
210
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39
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City of West Covina, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, EPA, USDA
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Local Vicinity

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Aerial View

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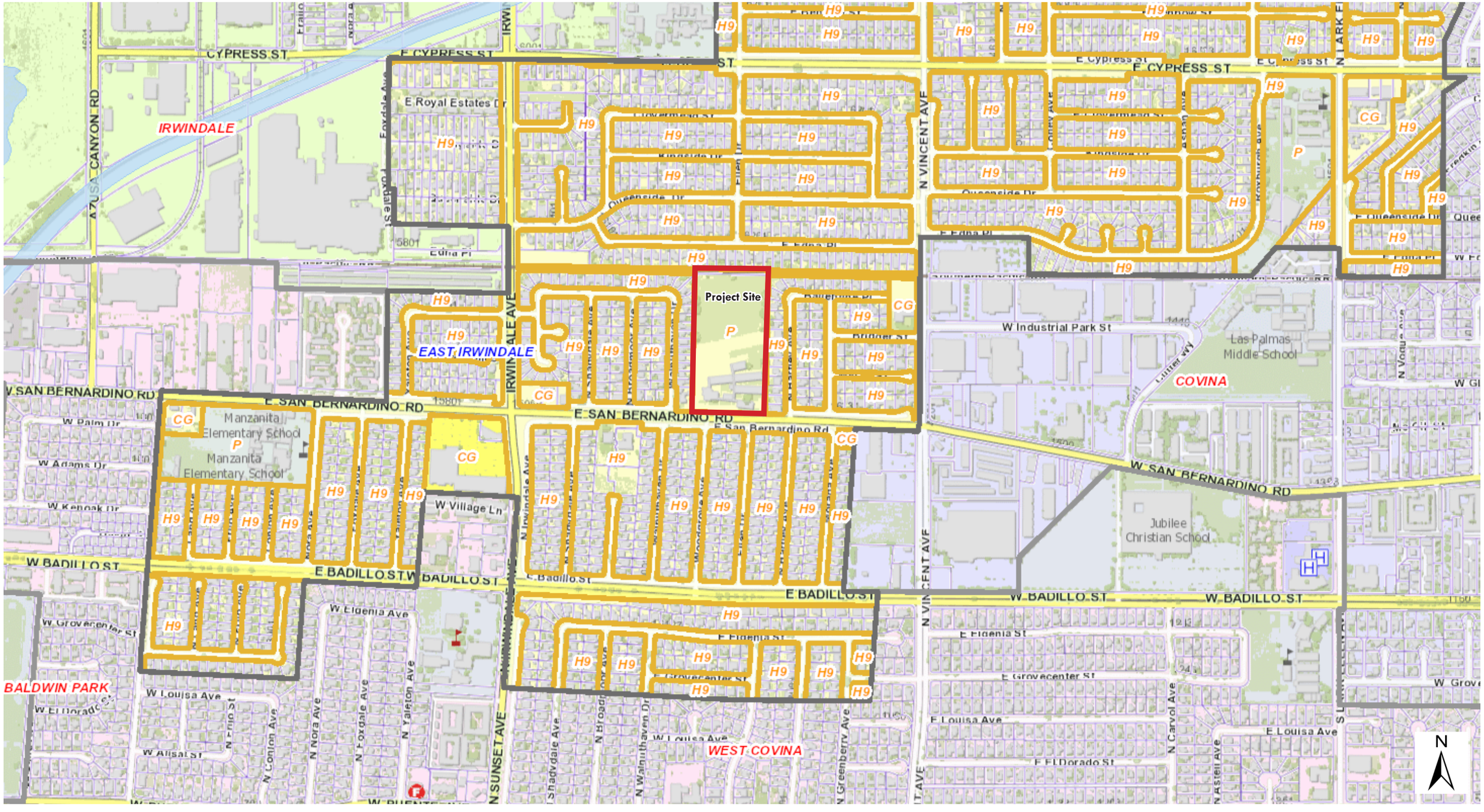
Project Site
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H9
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EAST IRWINDALE
WEST COVINA
BALDWIN PARK
COVINA
E CYPRESS ST
E SAN BERNARDINO RD
W SAN BERNARDINO RD
E BADILLO ST
W BADILLO ST
W Industrial Park St
Las Palmas Middle School
Manzanita Elementary School
Jubilee Christian School
N VINCENT AVE
N SUNSET AVE
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0 250 500 1,000 Feet

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PLAN 3625 SANTA BARBARA "B" | PLAN 3627 FARMHOUSE "E" | PLAN 3222 SANTA BARBARA "B" | PLAN 3625 FARMHOUSE "E" | PLAN 3222 COASTAL "C"

PRIVATE STREET G

PLAN 3625 FARMHOUSE "E" | PLAN 3222 COASTAL "C" | PLAN 3627 FARMHOUSE "E" | PLAN 3222 SANTA BARBARA "B" | PLAN 3627 COASTAL "C"

PRIVATE STREET F

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Conceptual Landscape Plan

1. Community Open Space
2. Recreation Open Space
3. Lawn Area
4. Small Vegetated Area
5. Community Mail Boxes
6. Proposed Wall/Fence
7. Enhanced Paving
8. Proposed Trees
9. 9' Walkway
10. 5' Sidewalk
11. 6' Sidewalk
12. 4' Entry Walkway
13. Accessible Parking Stall
14. Guest Parking Stall
15. Driveway
16. Private Yard
17. Dog Bag Station
18. Property Line
19. Public Street
20. Public Sidewalk
21. Short Term Bike Parking
22. Second Outdoor Lounge
23. Passive Seating Area
24. Open Flex Lawn
25. Corn Hole Area

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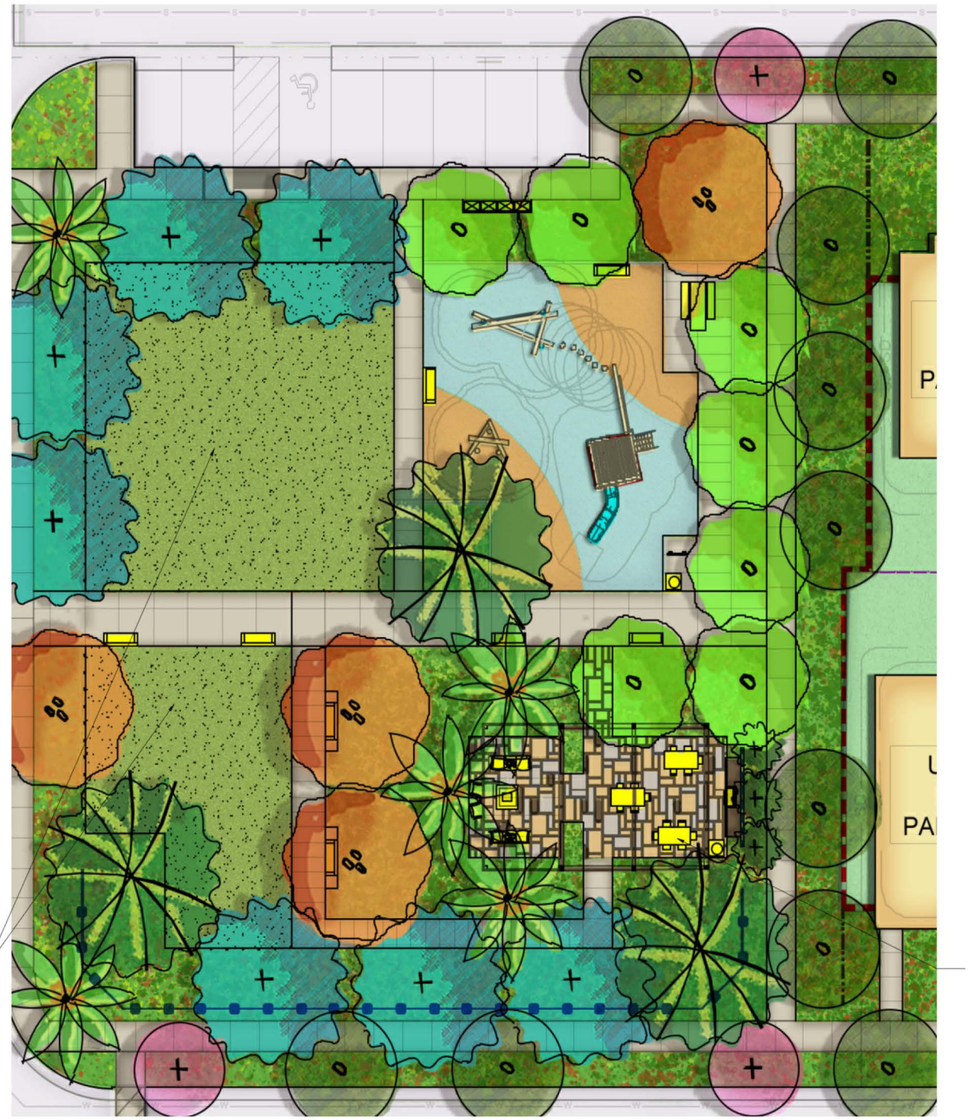
Conceptual Main Open Space Plan

Lawn Area:
-Real grass area
-Bench seating
-Passive and active play



Dining Area:
-Central community open space area
-Wood shade structure
-Down lighting
-Entertainment BBQ counter
-Table & chair seating
-Fire-pit for small social events and group gatherings

*Conceptual images (provided herein are conceptual and subject to change)

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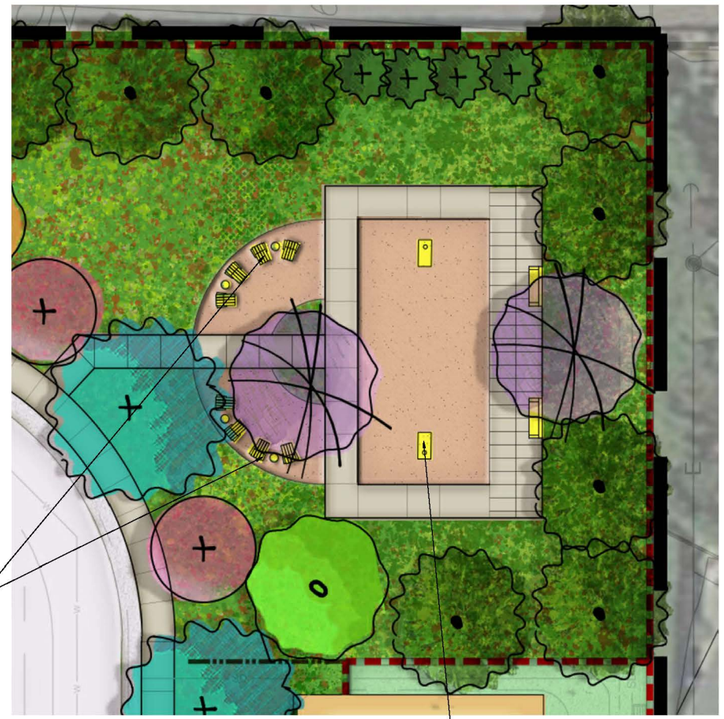
Conceptual Northern Open Space Plan

Open Space Area @ Northwest Corner

Passive seating area with decomposed granite, adirondack seating and shade trees.



Open Space Area @ Northeast Corner

Open flex lawn area.

*Conceptual images (provided herein are conceptual and subject to change)

Secondary outdoor lounge seating area with shade structure and enhanced paving.

Decomposed granite corn hole area with bench seating.

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Conceptual Wall and Fence Plan

WALL LEGEND

1. 6'-0" High split-face CMU wall, with 4" high split-face CMU cap (tan color).
2. 5'-6" High stucco over CMU wall, with precast concrete cap (tan color).
3. 5'-6" High vinyl fence (tan color).
4. 5'-0" High T. S. metal fence (black paint color).
5. 6'-0" High (18" sq.) stucco over CMU pilaster, with precast concrete cap (tan color).
6. 3'-6" High split-face CMU wall, with 4" high split-face CMU cap (tan color).
7. 5'-6" High vinyl private yard gate (tan color).

ADA Path of Travel.

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#	Environmental Factor	Plan, Program, or Policy/Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
3.1	Air Quality	**PPP AQ-1: SCAQMD Rule 403.** The following measures shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 403: o All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. o The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. o The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.	Compliance with SCAQMD Rule 403	Prior to issuance of a grading permit.	Owner/Applicant	Los Angeles County Department of Public Works (DPW) and/or Public Health
3.2	Air Quality	**PPP AQ-2: SCAQMD Rule 1113.** The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 1113. The project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.	Compliance with SCAQMD Rule 1113	Prior to issuance of building permits.	Owner/Applicant	DPW: Building & Safety
3.3	Air Quality	**PPP AQ-3: SCAQMD Rule 445.** The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.	Compliance with SCAQMD Rule 445	Prior to issuance of building permits.	Owner/Applicant	DPW: Building & Safety

4.1	Biological Resources	**Mitigation Measure BIO-1: Special-Status Roosting Bats.** To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in tree cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:a) To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.b) If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified bat specialist shall conduct a pre-construction survey to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats. c) Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified bat specialist no greater than seven (7) days prior to tree disturbance or structure removal to more precisely determine the presence or absence of roosting bats.d) If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees or structures in a controlled manner using heavy machinery. In order to ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a bat specialist. Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawn up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one way	Pre-construction bat survey.	Prior to issuance of a grading and/or demolition permits.	Owner/Applicant	Los Angeles County Department of Regional Planning (Regional Planning)

		exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.e) Maternity season lasts from March 1 to September 30. Trees or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A structure containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.f) The bat specialist shall document all demolition monitoring activities and prepare a summary report to the County upon completion of tree disturbance or building demolition activities. If Townsend's big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.				
4.2	Biological Resources	**Mitigation Measure BIO-2: Bat Relocation.** If confirmed occupied or formerly occupied bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality shall be constructed and maintained at a suitable undisturbed area. The design and location of the artificial bat roosts shall be determined by the bat specialist in consultation with CDFW. a) In exceptional circumstances, such as when roosts cannot be avoided and bats cannot be evicted by non-invasive means, it may be necessary to capture and transfer the bats to appropriate natural or artificial bat roosting habitat in the surrounding area. Bats raising young or hibernating shall not be captured and relocated. Capture and relocation shall be performed by the bat specialist in coordination with CDFW, and shall be subject to approval by Los Angeles County Department of Regional Planning (DRP) and CDFW. b) A monitoring plan shall be prepared for the replacement roosts, which shall include performance standards for the use of the replacement roosts by the displaced species, as well as provisions to prevent harassment, predation, and disease of relocated bats.	If bat roosting habitat is found onsite.	Prior to issuance of demolition and/or grading permits	Owner/Applicant	Regional Planning

		c) Annual reports detailing the success of roost replacement and bat relocation shall be prepared and submitted to Los Angeles County Department of Regional Planning and CDFW for five (5) years following relocation or until performance standards are met, whichever period is longer				
4.3	Biological Resources	**Mitigation Measure BIO-3: Nesting Birds.** Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, which generally runs from February 1 – August 31 (as early as January 1 for some raptors), to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a	Pre-construction nesting bird survey.	Prior to issuance of demolition and/or grading permits	Owner/Applicant	Regional Planning

		qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.				

5.1	Cultural Resources	**Mitigation Measure CUL-1: Archaeological Monitoring.** Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified archaeologist has been retained, from a qualified professional archeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A stating that the archeologists have been retained and will be present at pre-grade meetings and for all initial ground disturbing activities. The archaeologist shall provide spot check monitoring as determined necessary by the retained archaeologist. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find would need to occur. In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the County shall be immediately notified. The archeologist shall be contacted to flag the area in the field and shall determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)). If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions	Archaeological monitoring.	Prior to issuance of grading permits	Owner/Applicant	Regional Planning

		of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the developer/applicant's expense.				
5.2	Cultural Resources	**Mitigation Measure CUL-2: Paleontological Incidental Discoveries**. Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified paleontologist has been retained and either the paleontologist, or a representative, shall be onsite if excavations penetrate the bedrock formations. In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The project applicant shall then inform the Los Angeles County Natural History Museum of the find and retain a qualified paleontologist. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discard of specific fossil specimens will be made explicit by the qualified paleontologist. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage	Paleontological Monitoring.	Prior to issuance of grading permits	Owner/Applicant	Regional Planning

		and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.				
5.3	Cultural Resources	**Mitigation Measure CUL-3: Human Remains.** If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98).	Compliance with Public Resources Code Section 5097.98 and California Health and Safety Code Section 7050.5	During grading activities or ground disturbance.	Owner/Applicant	County Coroner, NAHC, Regional Planning, or designee

7.1	Geology / Soils	**PPP GEO-1: CBC Compliance.** The project is required to comply with the California Building Standards Code (CBC) as included in the County Code as Title 26, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for the proposed project shall be incorporated into grading plans and building specifications.	Compliance with the California Building Standards Code.	Prior to issuance of building permits	Owner/Applicant	DPW: Building & Safety
9.1	Hazards / Hazardous Materials	**PPP HAZ-1: SCAQMD Rule 1403.** Pursuant to existing regulations, prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District (SCAQMD) Rule 1403. Prior to issuance of demolition permits the applicant shall provide verification that the following SCAQMD Rule 1403 regulations have been taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	Asbestos survey.	Prior to issuance of demolition permits.	Owner/Applicant	DPW: Building & Safety

9.2	Hazards / Hazardous Materials	**PPP HAZ-2: Lead.** Pursuant to existing regulation, prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, County demolition permits shall ensure that all procedural requirements and regulations are followed for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.	Lead-based paint survey.	Prior to issuance of demolition permits.	Owner/Applicant	DPW: Building & Safety
9.3	Hazards / Hazardous Materials	**Mitigation Measure HAZ-1:** Prior to issuance of a grading permit, a soils testing plan for arsenic shall be prepared by a qualified hazardous materials consultant and approved by the County Building and Safety Division and County Department of Public Health , Environmental Health Division that shall detail procedures and protocols for testing any soils that require offsite disposal. Based on testing results soils shall be transported and disposed of per California Hazardous Waste Regulations to an appropriately permitted landfill. Any soil contaminated with concentrations of arsenic exceeding 12 ppm shall be removed and transported to an appropriately permitted disposal facility prior to site grading and development activities. Should the volume of arsenic impacted soil exceed 50 cubic yards, a SCAQMD Rule 1466 permit would be required and shall be implemented during soil excavation and removal activities. Soils testing and disposal requirements shall be included within all grading permits and specifications.	Soils testing plan for arsenic, if soils require offsite disposal.	Prior to issuance of grading permits	Owner/Applicant	DPW, Building & Safety Division and County Department of Public Health, Enviornmental Health Division

9.4	Hazards / Hazardous Materials	**Mitigation Measure HAZ-2:** Due to the potential for onsite soils to contain elevated levels of arsenic, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the County Department of Public Health, Environmental Health Division prior to the commencement of excavation and grading. The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of arsenic are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase 1 and Phase II ESAs. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.	Preparation of a Health & Safety Plan.	Prior to issuance of grading permits	Owner/Applicant	DPW, Building & Safety Division and County Department of Public Health, Enviornmental Health Division
9.5	Hazards / Hazardous Materials	**Mitigation Measure HAZ-3:** As part of the Home Buyer's package, the project Applicant/Owner shall provide new homeowners education materials on the proper management and disposal of household hazardous waste. The educational materials shall provide new homeowners with links to the County Department of Public Works' website regarding the Loa Angeles County Household Hazardous Waste Collection Program and provide the addresses of permanent household hazardous waste collection centers.	Preparation of education materials regarding household hazardous waste for new homeowners	Prior to issuance of occupancy permits	Owner/Applicant	DPW, Building & Safety Division

10.1	Hydrology / Water Quality	**PPP WQ-1: NPDES/SWPPP.** Prior to issuance of any grading or demolition permits, the applicant shall provide the County Department of Public Works evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Preparation of a SWPPP	Prior to grading permits	Owner/Applicant	DPW: Building & Safety
10.2	Hydrology / Water Quality	**PPP WQ-2: LID.** Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the County Department of Public Works The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.	Preparation of a LID	Priort to grading permits	Owner/Applicant	DPW: Building & Safety
13.1	Noise	**Mitigation Measure NOI-1:** Construction plans and specifications shall require that a minimum 8-foot-high temporary sound barrier (e.g., fiberglass core sound blanket or a 0.5-inch thick wooden panel sound wall) shall be placed on the property lines nearest the offsite homes to any stationary equipment (i.e., air compressors, generators, and welders) to be utilized onsite during construction of the proposed project. Construction plans and specifications shall also state that stationary construction equipment shall be located a minimum of 100 feet from the property line of any offsite residence. Noise control requirements shall be noted and depicted on project construction drawings/plans.	Use of a temporary sound barrier.	Priort to grading permits	Owner/Applicant	DPW: Building & Safety

13.2	Noise	**Mitigation Measure NOI-2:** The project construction plans and specifications shall state that operation of off-road construction equipment that is 150 horsepower or greater shall not occur within 10 feet of either the east or west property lines in order to limit construction-related vibration levels at the nearby residences. Typical construction equipment that is less than 150 horsepower include backhoes, skid steers, skip loaders, and tractors, that are capable of performing all grading and excavation activities within the 10-foot wide areas adjacent to the east and west property lines. Noise control requirements shall be noted and depicted on project construction drawings/plans.	Prohibition of certain construction equipment.	Priort to grading permits	Owner/Applicant	DPW: Building & Safety
18.1	Tribal Cultural Resources	**Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** A. The project applicant/owner shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs	Retention of a Native American Monitor.	Prior to issuance of a grading permit.	Owner/Applicant	Regional Planning

		that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon (1) written confirmation to the Kizh from a designated point of contact for the project applicant/owner that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.				

18.2	Tribal Cultural Resources	**Mitigation Measure TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects** A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in	Procedures for unanticipated discoveries.	Prior to issuance of a grading permit and during grading activities and ground disturbance.	Owner/Applicant	Regional Planning

		origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.				
18.3	Tribal Cultural Resources	**Mitigation Measure TCR-3: Procedures for Burials and Funerary Remains** A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy	Procedures for burials and funerary remains.	Prior to issuance of a grading permit and during grading activities and ground disturbance.	Owner/Applicant	Regional Planning

		equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed, as described in item E. E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.				

19.1	Utilities and Service Systems	**Mitigation Measure UT-1:** Prior to the issuance of building permits, per the will serve letter dated December 3, 2020, the project applicant shall pay all applicable in-lieu sewer upgrade fees to the City of West Covina.	Payment of in-lieu sewer upgrade fees to City of West Covina.	Prior to the issuance of building permits.	Owner/Applicant	Regional Planning
21	Mitigation Compliance	As a means of ensuring compliance of above mitigation measures, the Owner/Applicant are responsible for submitting compliance report to the Department of Regional Planning for review, and for replenishing the mitigation monitoring account if necessary until such as all mitigation measures have been implemented and completed.	Submittal and approval of compliance report and replenishing mitigation monitoring account	Yearly and as required until all measures are completed.	Owner/Applicant	Regional Planning

* In the "#" column, the number before the decimal should always correspond with the chapter number in the initial study.