

DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Norumbega Drive Residence Project



LEAD AGENCY:

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SWCA Project No. 67447

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1.0 INTRODUCTION

The proposed Norumbega Drive Residence Project (project) is located on Norumbega Drive near the intersection of Norumbega Drive and Norumbega Road, Monrovia, California (Assessor's Parcel Number [APN] 8523-002-045). The project would construct one single-family residence on the 1.295-acre lot. The single-family residence would be a 3,758-square-foot, two-story dwelling with a 1,348-square-foot four-car garage and would include patios and retaining walls. The site would be landscaped, and utility improvements would be installed to serve the proposed residence. The project site is zoned Public/Quasi Public.

Following a preliminary review of the project, the City of Monrovia (City) determined the project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study analyzes the potential direct, indirect, and cumulative environmental effects of the project.

1.1 CEQA Statutory Authority and Requirements

In accordance with Sections 15051 and 15367 of the California Code of Regulations (CCR), the City is identified as the Lead Agency for the project. Under CEQA (Public Resources Code [PRC] Section 21000-21177) and pursuant to Section 15063 of the CCR, the City is required to undertake the preparation of an Initial Study to determine if the project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration). Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (PRC Section 21080[c]).

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for considering discretionary actions necessary to approve or undertake the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

1.2 Purpose

CEQA Guidelines Section 15063 identifies the following specific contents for inclusion in an Initial Study:

- A description of the project, including the location of the project;
- An identification of the environmental setting;



- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- A discussion of ways to mitigate significant effects identified, if any;
- An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 Consultation

Pursuant to CEQA Guidelines Section 15063(g), as soon as the Lead Agency (in this case, the City) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, in order to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 Incorporation by Reference

The following documents were used during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at the City of Monrovia Community Development Department, 415 South Ivy Avenue, Monrovia, California, 91016.

- **Monrovia General Plan (February 2020).** The Monrovia General Plan (General Plan), updated February 2020, is a long-range planning document that guides decisions related to land use. The General Plan includes the following seven elements: Land Use, Circulation, Housing, Safety, Noise, Open Space, and Conservation.
- **Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (January 2008).** The Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (State Clearinghouse Number [SCH No.] 2007021135) (LUC EIR) evaluates the environmental effects associated with the adoption and implementation of the proposed Land Use and Circulation Elements initiated by the City.
- **Monrovia Municipal Code.** The Monrovia Municipal Code (Municipal Code), Codified through Ordinance 2013-15 Section 2, 2003, consists of codes and ordinances adopted by the City. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety. Title 17, Zoning (Zoning Ordinance), includes an official land use plan for the City and is adopted and established to serve the public health, safety, and general welfare and to provide the economic and social advantages resulting from an orderly planned use of land resources.



2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

PROJECT LOCATION

The Norumbega Drive Residence Project site is located on Norumbega Drive, approximately across the street from 554 Norumbega Drive, Monrovia, California (Assessor's Parcel Number [APN] 8523-002-045); refer to Figure 2-1, Regional Vicinity. Regionally, the site is located approximately 1.9 miles north of Interstate (I-) 210, and approximately 2.7 miles northwest of the junction with I-605. Locally, the site is located on the north side of the street, approximately 530 feet northeast of the intersection with Norumbega Road; refer to Figure 2-2, Site Vicinity.

EXISTING CONDITIONS

The project site is entirely within the city of Monrovia. The project site is at the western end of Norumbega Drive, across the street from 554 Norumbega Drive and approximately 330 feet northeast of the junction with Norumbega Road. The project site is a 1.295-acre undeveloped parcel, with disturbed chaparral and coastal sage scrub as well as oak woodlands. The project area boundaries are depicted in Figure 2-3, Site Plan.

The project site and immediate surroundings include steep hillsides. The project site varies from approximately 823 feet above mean sea level (amsl) at Norumbega Drive to 978 feet amsl at the northwestern corner, which is its highest point. The property slopes steeply toward Norumbega Drive, which in turn slopes toward the Sawpit Wash and continues south as Norumbega Drive.

In the vicinity of the project site, the southwest, south, and east sides of the parcel are developed with one- and two-story single-family homes. Open space, including a steep hillside, exists immediately north of the project site. Approximately 380 feet northwest of the project site are the Sawpit Spreading Grounds, which are used to divert water from the Sawpit Reservoir and Sawpit Debris Basin for groundwater recharge.¹ Undeveloped hillsides leading up to the San Gabriel Mountains are north and east of the project site. The Angeles National Forest is 0.75 mile east and 0.92 mile northwest at its closest points. Municipal development, primarily residential, exists to the south and west. Sawpit Wash is approximately 350 feet southwest of the project site.

¹ Los Angeles County Department of Public Works. 2021. Spreading Grounds: Sawpit Spreading Ground. Available at: <https://ladpw.org/wrd/spreadingGround/information/facdept.cfm?facinit=2>. Accessed July 13, 2021.



Norumbega Drive Residence Project
Draft Initial Study/Mitigated Negative Declaration

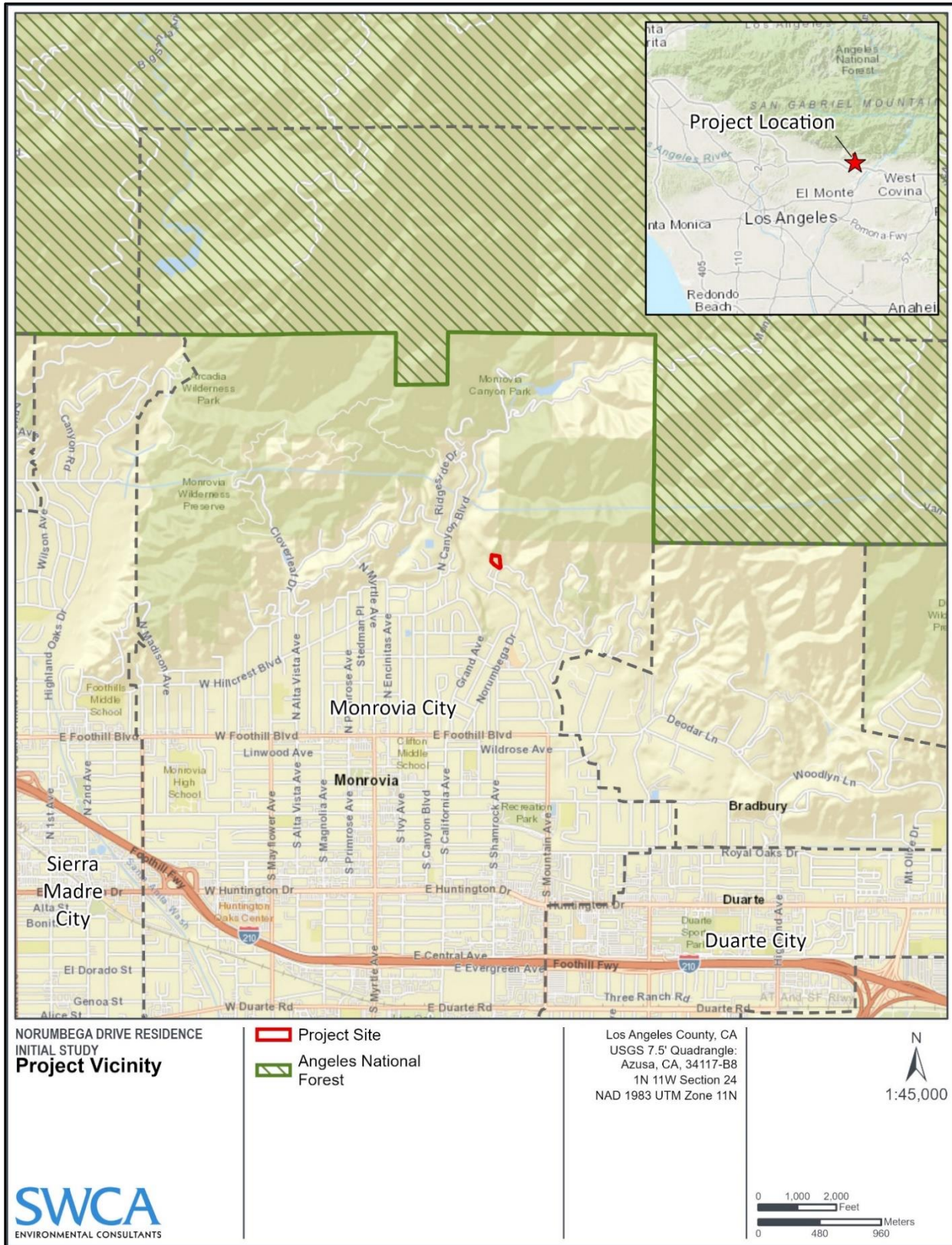


Figure 2-1 Regional Vicinity



Figure 2-2 Site Vicinity



Surrounding uses primarily consist of residential and open space or vacant land. Table 2-1 further describes the adjacent development.

**Table 2-1
Surrounding Land Uses**

Direction	General Plan Designation	Zoning	Existing Uses
North	Public/Quasi Public	P/QP	Vacant
East	Residential Foothill	RF	Single-family residences
South	Residential-Low Density; road, Residential Foothill	RL, RF	Single-family residences
West	Public/Quasi Public	P/QP	Sawpit Spreading Grounds

Notes: P/QP = Public/Quasi Public; RF = Residential Foothill; RL = Residential - Low density

EXISTING GENERAL PLAN LAND USE AND ZONING

Per the General Plan Land Use Map, the project site is designated Public/Quasi Public (P/QP). Properties designated Public/Quasi Public are intended for “all public uses such as schools, and government offices and facilities, as well as quasi-governmental offices and facilities such as those for the telephone company and other utilities.” Per the City of Monrovia Zoning Ordinance, single-family residential development is not a permitted use or a conditional use. Per the City of Monrovia Zoning Map, the project site is zoned P/QP. The project would require a General Plan Amendment and rezoning of the site to Residential Foothill.

2.2 Project Characteristics

The project would rezone the existing lot from Public/Quasi Public to Residential Foothill (RF) and construct one single-family residence on Norumbega Drive. The two-story residence would be 3,758 square feet of livable space. As well, a four-car garage on the lowest level would add an additional 1,348 square feet. The lot is 56,410 square feet (1.295 acres). The lot is a wedge-shape and the narrowest part, which fronts the street, is just over 38 feet in width. The project design plans are shown in Figure 2-3, Site Plan, and Figure 2-4, Building Elevations, and are included in Appendix A.² All utilities are available in Norumbega Drive and would be extended to the new residence.

Since the project would require a zoning change to Residential Foothill, the following analysis uses the design requirements for the RF zoning designation. According to the design plans submitted to the City by the Project Sponsor, Group Atom Development, the project proposes one retaining wall with fencing on top to be constructed in excess of the maximum height allowed; refer to Table 4-11, Project Consistency with Residential Foothill (RF) Zone. The Project Sponsor is requesting a Minor Exception to allow the retaining wall with fencing on top on the west side of the property to be 10 feet in height, more than the 6-foot maximum height allowed under Zoning Ordinance Section 17.12.040. In addition to this Minor Exception request, the approval of a Neighborhood Compatibility Design Review (Level 6) is required. This review would be incorporated into the project’s approval process as listed in Section 2.3, with reviews from the Development Review Committee, Planning Commission, and City Council. The proposed

² Herrera, G. 2021. New Residence. Norumbega Rd. Monrovia CA, 91016. Site Plan. A+G Concepts. Glendora, CA.



residence would meet all other requirements of the City's Zoning Ordinance for residential foothill lots as described below (see Figure 2-3, Site Plan):

- **Height.** The maximum allowable building height on a lot in the Residential Foothill zoning designation is 27 feet above finished grade for lots less than 75 feet in width. The maximum height of the proposed dwelling would be 25 feet 6 inches above finished grade.
- **Setbacks.** Under the City's Zoning Ordinance, a Residential Foothill lot must have a front setback of 25 feet for the main residence. The first-story side setbacks must be 10 percent (%) of lot width, with a minimum of 5 feet and maximum of 15 feet; second-floor side setbacks must be 15 feet. Rear setbacks are 25% of the lot depth and a minimum of 20 feet. The project has a front setback of 25 feet, first-floor side setbacks of 6 feet, and second-floor side setbacks of 15 feet.
- **Floor Area Ratio (FAR).** The City's Zoning Ordinance requires the main dwelling to have a maximum FAR based on the following calculation: 35% of the net lot area for the first 20,000 square feet, plus an additional 10% of the remaining net lot area. This FAR calculation results in an allowable floor area of 10,641 square feet. The FAR of the residence, including the garage, would be 5,106 square feet.
- **Access and Parking.** The proposed driveway would be directly connected to Norumbega Drive. The Zoning Ordinance for a residential hillside lot requires a two-car garage. The proposed residence would include a four-car garage.

The project would also meet all requirements of the Monrovia Fire and Rescue regarding fire hazard. Monrovia Fire and Rescue has reviewed the plans and approved them with the following notations:

1. Structure shall be fire sprinklered per California Residential Code (CRC) 313 and Monrovia Municipal Code amendments.
2. Structure is located in the Wildland-Urban Interface and shall comply with CRC 337 requirements.
3. A vegetation management plan in compliance with California Fire Safe Council 4906 and the Monrovia Municipal Code shall be provided with architectural submittal.

The Monrovia Fire and Rescue comment letter is included as Appendix B.

CONSTRUCTION

Construction and Grading. The one single-family residence would be expected to take approximately 16 months to construct. Construction would require extensive grading, to a depth of up to 11 feet, and would result in approximately 576 cubic yards of cut and 266 cubic yards of fill. Approximately 252 cubic yards of soil would be exported from the site. The grading plan is shown in Figure 2-5, Grading Plan.

Construction equipment would include, but is not limited to, half-ton truck, forklift, grader, rubber-tired dozer, crane, backhoe, cement truck, 10-cubic-yard dump/haul truck, a semi-truck flatbed, site delivery truck, paver, water truck, welder, and air compressor, as well as power tools. Construction traffic would access the site from I-210, East Foothill Boulevard, and Norumbega Drive, via South Mountain Avenue.

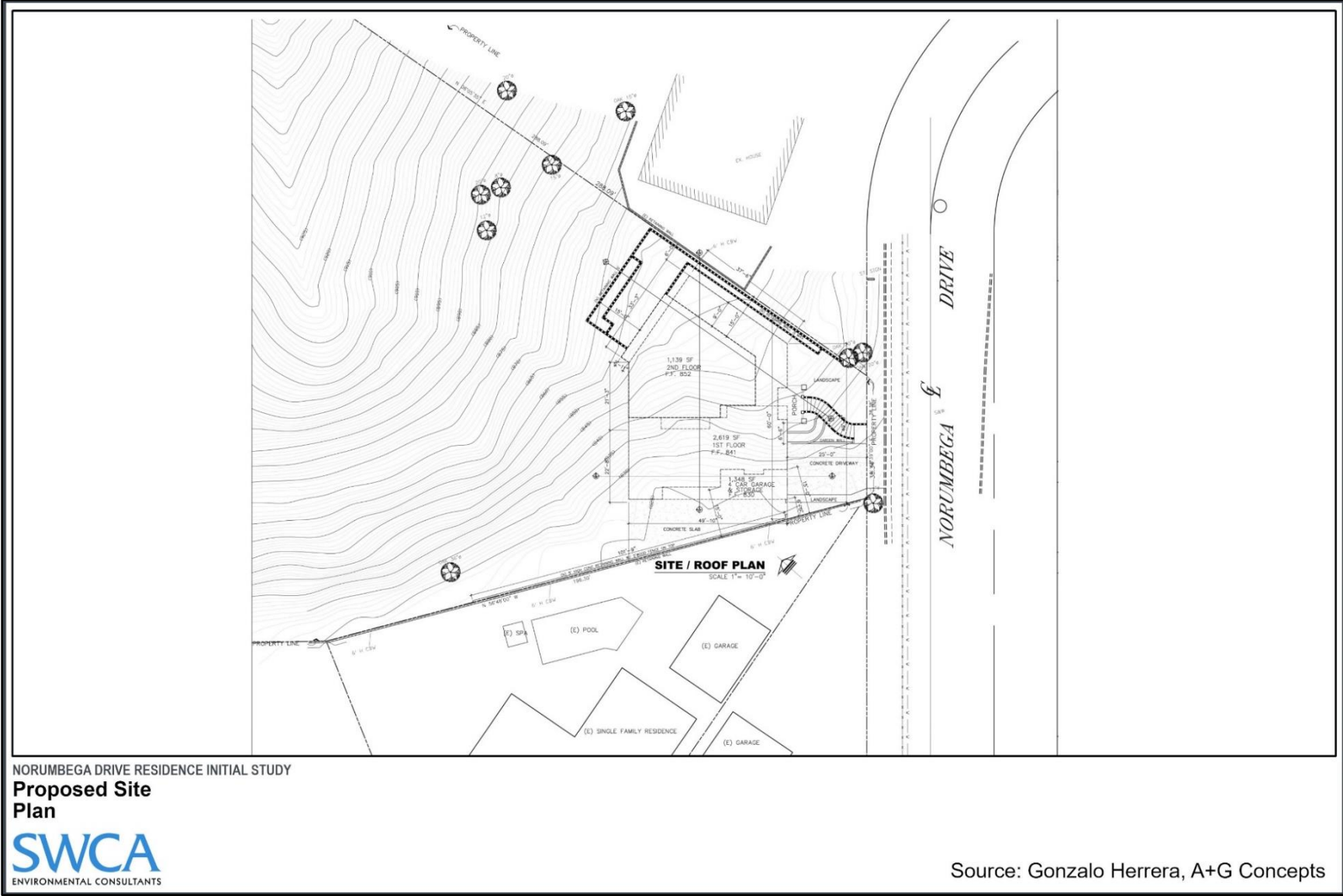


Figure 2-3 Site Plan



NORUMBEGA DRIVE RESIDENCE INITIAL STUDY

**Proposed Building
Elevations**



Source: Gonzalo Herrera, A+G Concepts

Figure 2-4 Building Elevations



Construction would start in early April 2022 and be expected to last through August 2023. Construction would occur Monday through Friday, from 7:00 a.m. to 7:00 p.m. and Saturdays (and holidays, from 9:00 a.m. to 6:00 p.m. as permitted by the Municipal Code (Monrovia Municipal Code Section 9.44.080)(F)).

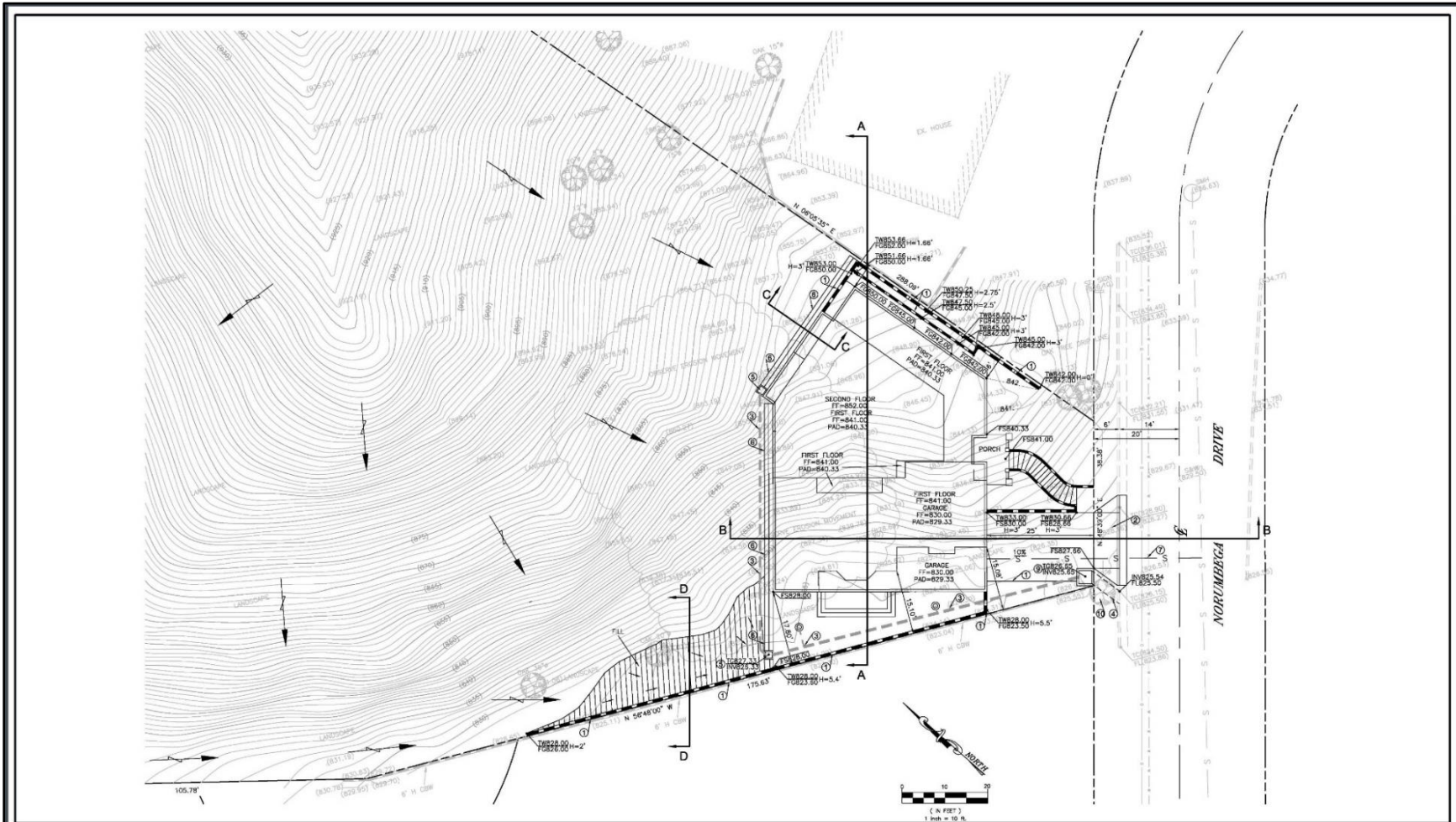
UTILITIES

Utilities would be supplied to the project as follows:

- **Water:** There is an existing water line in Norumbega Drive that would serve the project. The project would run water laterals for domestic water and fire flow from the existing water line to the residence. The project would require a will serve letter from the City Department of Public Works Water Department.
- **Sewer:** There is an existing sewer line in Norumbega Drive that would serve the project. The project would run a sewer lateral from the existing sewer line to the residence. The project would require a will serve letter from the City Department of Public Works.
- **Landscape Irrigation Requirements:** The City has adopted the State of California's Model Water Efficient Landscape Ordinance (MWELO).³ All new irrigation for landscaping will be required to comply with the State's Water Efficiency Landscape Ordinance (Ordinance 2016-01). The project will be required to provide a complete Landscape Ordinance Documentation Package including the items listed in Section 492.3 of the Ordinance.
- **Stormwater Management:** Stormwater in the project area flows southwest on Norumbega Drive and drains to Sawpit Wash via a storm drain. No impervious surfaces currently exist within the project site. The project would result in an increase of impervious surface compared to existing conditions of approximately 3,900 square feet. The City would need to approve the landscaping and stormwater retention plan.
- **Electricity and Gas:** Existing utilities include an overhead electrical line on the north side of Norumbega Drive and an existing natural gas line in Norumbega Drive. Natural gas and electricity access has not been defined to date. All connections would be through underground service connections. Existing infrastructure exists in the Norumbega Drive right-of-way. Southern California Edison and SoCal Gas would need to approve the location and engineering details of electrical and gas extensions, respectively, to supply the project. As required by the adopted 2019 Green Building Code, a solar system is required for the residence.⁴

³ California Department of Water Resources. 2015. Model Water Efficient Landscape Ordinance. Title 23 CCR 2.7. Available at: <https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I55B69DB0D45A11DEA95CA4428EC25FA0&originationContext=documenttoc&transitionType=Default&contextData=%28sc.Default%29>. Accessed July 15, 2021.

⁴ California Building Standards Commission. 2019. 2019 California Green Building Standards Code. Cal Green. 24 CCR 11. Available at: <https://codes.iccsafe.org/content/CAGBSC2019/cover>. Accessed July 15, 2021.



NORUMBEGA DRIVE RESIDENCE INITIAL STUDY
**Proposed Grading
Plan**



Source: Gonzalo Herrera, A+G Concepts

Figure 2-5 Grading Plan



LANDSCAPING

The project site is covered by disturbed chaparral/coastal sage scrub, 0.17 acre of oak woodland, and one isolated coast live oak (*Quercus agrifolia*), for a total of six coast live oak trees on the project site and one coast live oak on the adjacent parcel whose dripline overhangs the project site.⁵ The project would not remove any oak trees. The project would be constructed within the dripline of two of the protected live oaks and the retaining walls would be near the base of those oaks. One coast live oak tree would require pruning of approximately 10% of its canopy, and approximately 20% of its root structure would be impacted by construction of the retaining wall. The second coast live oak would require pruning of approximately 10% of its canopy and loss of approximately 40% of its root structure. The remaining five coast live oaks would not be impacted by the project.⁶

The project would comply with the California Department of Water Resources (DWR) MWELO and would be required to submit a landscape plan to the City for approval.⁷ The landscape submittal would include the following:

- water efficient landscape worksheet;
- hydrozone information table;
- water budget calculations;
- soil management report; and
- irrigation design plan.

The project would also be required to comply with the Monrovia Fire and Rescue landscaping requirements for fire-safe landscaping in the Wildland-Urban Interface (WUI) and Very High Fire Hazard Severity Zone (VHFHSZ) and would need to receive approval from the Monrovia Fire and Rescue. The landscaping plan would:

- retain all existing native oak trees;
- include water-efficient and native species;
- include fire-resistant plants that meet the requirements of the Monrovia Fire and Rescue;⁸
- exclude invasive exotic plants; and
- include adequate irrigation to maintain a healthy landscape.

⁵ When the Arborist Report (Rebecca Latta Arboricultural Consulting 2020) was completed, a total of seven oak trees were present at the site. However, the oak tree identified as Tree #3 in the Arborist Report was removed after the Arborist Report was finalized. The removal was authorized by the City of Monrovia in November 2020, pursuant to Oak Tree Preservation Permit MISC2020-0007 (City of Monrovia 2020a).

⁶ Rebecca Latta Arboricultural Consulting. 2020. *Arborist Report. Norumbega Drive (APN: 8523-002-045)*. Glendora, CA. April 13.

⁷ California Department of Water Resources (DWR). 2015. *Model Water Efficient Landscape Ordinance*. Available at: <https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Model-Water-Efficient-Landscape-Ordinance>. Accessed July 15, 2021.

⁸ Los Angeles County Department of Public Works. 2003. *Smart Gardening information Sheet. Fire-Wise Gardening*. Available at: https://dpw.lacounty.gov/epd/sg/tech_sheets/fwg_info.pdf. Accessed September 16, 2021.



2.3 Project Approvals and Permitting Agencies

The Initial Study/Mitigated Negative Declaration (IS/MND) is intended to provide environmental review for full implementation of the project, including all discretionary actions and ministerial permits associated with it. The list of permits and approvals herein does not limit the applicability of the IS/MND to other permits or approvals that may be required because the IS/MND has analyzed the full scope of potential environmental impacts that could be associated with the project. The City is the Lead Agency with approval authority over the project.

The following City approvals and permits are required for the project:

- General Plan Amendment from Public/Quasi Public to Residential Foothill
- Zone Change from Public/Quasi Public to Residential Foothill
- Minor Exception (to exceed wall heights on west side)
- Advisory Review from the Development Review Committee
- Hillside Development Permit
- Neighborhood Compatibility Design Review (Level 6)
- Grading Permit
- Building Permit
- Monrovia Fire and Rescue approval of landscaping plans
- Landscape Plan Check



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3.0 ENVIRONMENTAL CHECKLIST

3.1 Background

1.	Project Title: Norumbega Drive Residence Project
2.	Lead Agency Name and Address: City of Monrovia Planning Division 415 South Ivy Avenue Monrovia, CA 91016
3.	Contact Person and Telephone Number: Vincent Gillespie, Planning Technician (626) 932-5504
4.	Project Location: The Norumbega Drive Residence Project (project) site is located on Norumbega Drive, near the intersection of Norumbega Drive and Norumbega Road, Monrovia, California (Assessor's Parcel Number [APN] 8523-002-045); refer to Figure 2-1, Regional Vicinity. Regionally, the site is located approximately 1.9 miles north of Interstate 210 (I-210), and approximately 2.7 miles northwest of the junction with I-605. Locally, the site is located on the north side of the street, approximately 330 feet northeast of the intersection with Norumbega Road; refer to Figure 2-2, Site Vicinity.
5.	Project Sponsor's Name and Address: Mr. Miguel Uribe Group Atom Development 802 South Ditman Avenue Los Angeles, California 90023
6.	General Plan Designation: Based on the General Plan Land Use Map, the project site is designated Public/Quasi Public.
7.	Zoning: The project site is zoned Public/Quasi Public (P/QP).
8.	Description of the Project: The project would rezone one lot from Public/Quasi Public to Residential Foothill, and construct one single-family residence on the 1.295-acre lot. This would require a General Plan Amendment and zone change. The single-family residence would be a 3,758-square-foot, two-story dwelling with a 1,348-square-foot four-car garage and would include patios and retaining walls. The site would be landscaped, and utility improvements would be installed to serve the proposed residence. Refer to Section 2.0, Project Description.
9.	Environmental Setting: Refer to Section 2.1, Project Location and Setting
10.	Public Agency Approvals and Recommendations: Refer to Section 2.3, Project Approvals and Permitting Agencies.
11.	California Native American Tribal Consultation: In compliance with Assembly Bill (AB) 52, the City distributed letters notifying Tribes of the opportunity to consult regarding the project. Refer to Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources.



3.2 Environmental Factors Potentially Affected

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

Aesthetics (Section 4.1)	Mineral Resources Section (4.12)
Agriculture and Forestry Resources (Section 4.2)	Noise (Section 4.13)
Air Quality (Section 4.3)	Population and Housing (Section 4.14)
Biological Resources (Section 4.4)	Public Services (Section 4.15)
Cultural Resources (Section 4.5)	Recreation (Section 4.16)
Energy (Section 4.6)	Transportation (Section 4.17)
Geology and Soils (Section 4.7)	Tribal Cultural Resources (Section 4.18)
Greenhouse Gas Emissions (Section 4.8)	Utilities and Service Systems (Section 4.19)
Hazards and Hazardous Materials (Section 4.9)	Wildfire (Section 4.20)
Hydrology and Water Quality (Section 4.10)	Mandatory Findings of Significance (Section 4.21)
Land Use and Planning (Section 4.11)	



3.3 Evaluation of Environmental Impacts

This section analyzes the potential environmental impacts associated with the project. The environmental factors evaluated in this Initial Study include:

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

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the CEQA Guidelines and used by the City in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- No Impact. The project will not have any measurable impact on the environment.
- Less Than Significant Impact. The project has the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.
- Less Than Significant Impact With Mitigation Incorporated. The project has the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the project's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- Potentially Significant Impact. The project has impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures are required, so that impacts may be avoided or reduced to the maximum extent feasible.



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4.0 ENVIRONMENTAL ANALYSIS

The following is a discussion of potential project impacts as identified in the Initial Study/Environmental Checklist. Explanations are provided for each item.

4.1 Aesthetics

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

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

Less Than Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest, or panoramic views of large geographic areas of scenic quality, from a fixed vantage point or linear corridor such as a roadway or trail. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista.

Visual resources identified in the General Plan include the San Gabriel Mountains, located approximately 2 miles north of the city. Municipal Code Section 17.12.010 provides development standards for view preservation in hillside areas (specifically identified as the Residential Foothill Zone) where views are more pronounced due to topography. According to the Municipal Code, “sensitive areas” in the viewshed are those which are higher in elevation and visually exposed to the city-at-large and could potentially impact existing city-at-large viewsheds. Proposed dwelling units designated as "sensitive" shall be set back from the top of the slope a distance determined by the line-of-sight analysis in addition to the required setbacks.



The project is located northeast of the city center in the foothills of the San Gabriel Mountains and within the Residential Foothill Zone. It is surrounded by one- and two-story homes to the south and east, a three-story home to the west. It is designed to occupy the lowest part of the project site adjacent to Norumbega Drive. The proposed structure would be two stories with an underlying garage/basement (up to 25 feet 6 inches in height), similar to the existing two-story residences on Norumbega Drive.

Views of the San Gabriel Mountains exist in the city, particularly along north-south-oriented roadways just north of I-210. Although the project is situated within the viewshed of these scenic corridors, the project would be constructed on the lowest part of the project site and views of the project from other parts of the city would be obscured by hilly topography and vegetation. Project implementation would not result in any substantial increases in view blockage of the San Gabriel Mountains and would not create a substantial adverse effect on a scenic vista. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. There are no designated or eligible State scenic highways located near the project site or within the vicinity.⁹ The nearest designated, or eligible for designation, State scenic highway is State Route 39 (SR-39), located approximately 4.5 miles east of the project site. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The project site is surrounded by urbanized uses to the south, east, and west, and open space to the north. The following discussion analyzes the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

Aesthetics of the Project

The project site is located within a developed residential neighborhood and is currently a vacant lot. There are residences to the east, Norumbega Drive and residences to south and east, residences and the Sawpit Spreading Basin to the west and northwest, and open space to the north. The project proposes one single-family residence on the lot.

The proposed residence would be located in the southeastern portion of the site adjacent to Norumbega Drive. The project site has a significant change in elevation, from approximately 823 feet amsl at Norumbega Drive to 978 feet amsl at the highest point. The project is

⁹ California Department of Transportation. 2021. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed January 26, 2021.



designed to sit on the lowest portion of the site and would extend to a maximum height of 25 feet 6 inches above finished grade; refer to Figure 2-4, Building Elevations, and Appendix A, Design Plans. Due to the hilly nature of the landscape and intervening trees and vegetation, the project would not be located in a “sensitive area” as defined by the City’s Zoning Ordinance and would not be visually exposed to the city-at-large; see Figure 2-3, Site Plan.¹⁰ The project design plans would adhere to all requirements of the City’s Zoning Ordinance with one exception: the retaining wall with fencing on top on the west side of the property to be 10 feet in height, in excess of the 6-foot maximum height allowed under Zoning Ordinance Section 17.12.040. In addition to this Minor Exception request, the approval of a Neighborhood Compatibility Design Review (Level 6) is required. This review would be incorporated into the project’s approval process as listed in Section 2.3, with reviews from the Development Review Committee, Planning Commission, and City Council.

As discussed in Section 2.2, Project Characteristics, Landscaping, the project would not remove any of the existing oak trees and would require submittal of a landscape design plan that meets the requirements of the DWR MWELo to the City for review and approval.

Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality

The existing hillside character of the project site and surrounding area include residential hillside properties adjacent to open space and public/quasi-public uses. Table 4-1, General Plan Policies Governing Scenic Quality, analyzes the project’s consistency with applicable goals and policies in the General Plan Land Use and Open Space Elements that relate to scenic quality. Refer to Section 4.11, Land Use and Planning, for a discussion concerning the project’s consistency with other applicable General Plan goals and policies. As analyzed in Table 4-1, the project would be consistent with those General Plan goals and policies pertaining to scenic quality.

**Table 4-1
General Plan Policies Governing Scenic Quality**

Applicable General Plan Policies	Project Consistency Analysis
GOAL 4: Promote land use patterns and development which contribute to community and neighborhood identity.	
Policy 4.1. Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.	<u>Consistent.</u> As detailed in Section 2.2, the proposed residence would have a maximum height of 25 feet 6 inches and would be designed to comply with the Hillside Residential Zoning Designation; refer to Figure 2-4, Building Elevations. The project is required to undergo advisory review from the Development Review Committee, as well as a Neighborhood Compatibility Design Review (Level 6).

¹⁰ Code Section 17.12.010.E.9. "Sensitive" areas are those which are higher in elevation and visually exposed to the city-at-large and could potentially impact existing city-at-large viewsheds. Proposed dwelling units designated as "sensitive" shall be set back from the top of the slope a distance determined by the line-of-sight analysis in addition to the required setbacks. The line of sight analysis is not designed to completely screen or eliminate the view of the dwelling units in sensitive areas. However, it is designed to minimize the visual impact of building lines using increased setback, berming, landscaping, and building design.



Applicable General Plan Policies	Project Consistency Analysis
GOAL 9: Preserve the character of existing neighborhoods and historic residences.	
<u>Policy 9.3.</u> Continue to monitor development standards in single-family and multifamily residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.	<u>Consistent.</u> As stated under Policy 4.1, above, the project is required to undergo advisory review from the Development Review Committee as well as a Neighborhood Compatibility Design Review (Level 6) and obtain design review approval from the City, which would ensure that the project design is compatible with existing development.
GOAL 10: Ensure that new development is sensitive to the City's natural and open space resources and constraints.	
<u>Policy 10.1.</u> Adhere to the Hillside Development Policies and Standards designed to regulate development in the foothills so as to maximize preservation of open space and ridgelines and minimize disruption of plant and animal life.	<u>Consistent.</u> The project would construct one single-family residence on an existing road. The residence would be constructed on the lowest part of the site and would retain all the existing oaks on the property. The project would be required to submit a landscape design plan that meets the requirements of the DWR Model Water Efficient Landscape Ordinance to the City for review and approval. Refer to Section 4.1, Aesthetics, for a discussion on the project's consistency with landscaping requirements.
<u>Policy 10.8.</u> Develop landscape guidelines to preserve existing trees and maximize new tree planting in new developments.	<u>Consistent.</u> The project has submitted an Arborist Report and would retain all the existing oaks on the property. In addition, the project would be required to submit a landscape design plan that meets the requirements of both the Monrovia Fire and Rescue and the DWR Model Water Efficient Landscape Ordinance to the City for review and approval. Refer to Section 4.4, Biological Resources, for a discussion of oak tree retention and mitigation measures.
<u>Policy 10.9.</u> Require water efficient landscaping in regard to plant selection and irrigation.	<u>Consistent.</u> The project has submitted an Arborist Report and would retain all the existing oaks on the property. In addition, the project would be required to submit a landscape design plan that meets the requirements of both the Monrovia Fire and Rescue and the DWR Model Water Efficient Landscape Ordinance to the City for review and approval. Refer to Section 4.1, Aesthetics, for a discussion on the project's consistency with landscaping requirements.
<u>Policy 10.13.</u> Continue to implement the Oak Tree Preservation Ordinance.	<u>Consistent.</u> The project has submitted an Arborist Report and would retain all the existing oaks on the property. See Section 4.4.e Biological Resources, for a discussion of oak tree retention and required mitigation measures. Adherence to the required mitigation measures BIO-5 and BIO-6 would ensure the project is in compliance with the Oak Tree Preservation Ordinance.



Applicable General Plan Policies	Project Consistency Analysis
<p>GOAL 11: The City of Monrovia shall provide its residents with a high-quality urban environment through the development and conservation of resources such as land, water, minerals, wildlife, and vegetation.</p>	
<p><u>Policy 11.7.</u> Comply with the National Pollutant Discharge Elimination System regarding stormwater management to reduce impacts from stormwater run-off.</p>	<p><u>Consistent.</u> The project would construct one single-family residence on an existing road and would be required to obtain approval of a stormwater retention plan that meets City requirements. The residence would be constructed on the lowest part of the site and would retain all the existing oaks on the property. The project would be required to submit a landscape design plan that meets the requirements of the DWR Model Water Efficient Landscape Ordinance to the City for review and approval.</p> <p>Refer to Section 4.1, Aesthetics, for a discussion on the project's consistency with landscaping requirements.</p>

Source: City of Monrovia. 2020. *City of Monrovia General Plan*. Updated February. Available at: <https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan>. Accessed July 20, 2021.

In conclusion, the project would not conflict with applicable policies or regulations governing scenic quality and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The single-family residence would include interior and exterior lighting that would create an additional source of illumination in the area. Vehicle headlights traveling to and from the residence would also illuminate the area. However, this increase would not be substantial because the project area is in an urban/suburban area to the south and west that is already illuminated from nearby residential uses at night. Section 17.32.080 of the Monrovia Municipal Code requires lighting be arranged to reflect away from adjoining property or any public way and be arranged so as not to cause a nuisance. The project would adhere to the Municipal Code; therefore, the project's lighting levels would be compatible with surrounding uses and lighting impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.



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4.2 Agriculture and Forestry Resources

<p><i>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. Would the project:</i></p>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>				✓
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>				✓
<p>c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>				✓
<p>d. Result in the loss of forest land or conversion of forest land to non-forest use?</p>				✓
<p>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?</p>				✓

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The



California Department of Conservation (CDOC), Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California.

The project site is 1.295 acres zoned as Public/Quasi Public. The project would require a General Plan Amendment and rezoning of the site to Residential Foothill. The project site is surrounded by single-family homes in an urban/suburban location to the south and west, the Sawpit Spreading Basin to the west, and undeveloped hillsides to the north and east. The land is designated as Urban or Built Up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.¹¹ Therefore, the project would have no impact on the conversion of farmland to non-agricultural uses.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.¹² The project site is not zoned for agricultural use and is not subject to a Williamson Act Contract. The only land under a Williamson Act Contract in Los Angeles County is on Santa Catalina Island.¹³ Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. “Forest land” is defined as land that “can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” “Timberland” is defined as land “which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.” Timberland zoned for Timber Production is defined as land that “is devoted to and used for growing and harvesting timber.” There is no land zoned for timber production within City or Los Angeles County limits, or in

¹¹ California Department of Conservation (CDOC). 2018. California Important Farmland Finder Interactive Viewer, Los Angeles County 2018. Sheet 2 of 2. CDOC Farmland Mapping Monitoring Program. Available at: <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>. Accessed July 20, 2021.

¹² California Department of Conservation (CDOC). 2019. Williamson Act Program. Available at: <https://www.conservation.ca.gov/dlrp/lca>. Accessed July 20, 2021.

¹³ California Department of Conservation (CDOC). 2017. State of California Williamson Act Contract Land. Available at: [https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf). Accessed July 20, 2021.



the Angeles National Forest north of the project site.^{14,15,16} The project site is on the northern edge of a residential subdivision and is primarily vegetated with disturbed chaparral and coastal sage scrub as well as approximately 0.17 acre of oak woodlands. The project site is zoned as Public/Quasi Public, with a proposed rezoning to Residential Foothill. Neither the current nor proposed zoning allow for management of forest or timberland resources; therefore, the project would have no impact on forest land or timberland.

Mitigation Measures: No mitigation measures are required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site is surrounded by urban uses and infrastructure, and as discussed in Section 4.2.c, is not located on forest land. No impact related to the loss of forest land or conversion of forest land would occur.

Mitigation Measures: No mitigation measures are required.

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. Refer to Responses 4.2(a) through 4.2(d). A significant impact may occur if a project involves other changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. As described in response to Agriculture and Forestry Resources (b), the project site is located in an area zoned for residential development and is surrounded by urban uses and infrastructure on three sides. Neither the project site nor the surrounding parcels are used for agricultural uses or forest land. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use would occur.

Mitigation Measures: No mitigation measures are required.

¹⁴ City of Monrovia. 2019. City of Monrovia Zoning Map. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/1378/636960188069700000>. Accessed July 20, 2021.

¹⁵ County of Los Angeles. 2015. *Los Angeles County General Plan 2035, Chapter 6. Land Use Element*. Available at: <https://planning.lacounty.gov/generalplan/generalplan>. Accessed July 20, 2021.

¹⁶ U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. 2005. *Angeles National Forest. Final Land Use Management Plan. Land Use Zones*. Available at: https://www.fs.usda.gov/Internet/FSE_MEDIA/stelprdb5311720.pdf. Accessed July 20, 2021.



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4.3 Air Quality

<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c. Expose sensitive receptors to substantial pollutant concentrations?			✓	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

The information presented in this analysis is based on and has been supplemented with the 2021 *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*, prepared by SWCA Environmental Consultants (SWCA), included here as Appendix C.

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

Less Than Significant Impact. The project is located within the South Coast Air Basin (Air Basin), which is governed by the South Coast Air Quality Management District (SCAQMD). On March 3, 2017, the SCAQMD Governing Board approved the 2016 Air Quality Management Plan (2016 AQMP). SCAQMD has initiated the development of the 2022 AQMP to address the attainment of the 2015 8-hour ozone standard (70 parts per billion) for the Air Basin and the Coachella Valley. However, the 2016 AQMP outlines the current strategies for meeting the National Ambient Air Quality Standards (NAAQS) for fine particulate matter (PM_{2.5}) and ozone (O₃). According to the SCAQMD’s 2016 AQMP, two main criteria (Criterion 1 and Criterion 2, described in detail below) must be used to evaluate a project’s consistency with the 2016 AQMP.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.



- a) *Would the project result in an increase in the frequency or severity of existing air quality violations?*

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed in Response 4.3(c), below, localized concentrations of carbon monoxide (CO), nitrogen oxides (NO_x), and fugitive dust (PM₁₀ and PM_{2.5}) would be less than significant during project construction and operations. Therefore, the project would not result in an increase in the frequency or severity of existing air quality violations. Because reactive organic gases (ROGs) are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs. Due to the role ROG plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

- b) *Would the project cause or contribute to new air quality violations?*

As discussed in Response 4.3(b), the project would produce emissions that would be below the SCAQMD construction and operational thresholds. Therefore, the project would not have the potential to cause or affect a violation of the ambient air quality standards.

- c) *Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

The project would result in less than significant impacts related to localized concentrations during project construction and operations. For this reason, the project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD air quality policies, it is important to recognize that air quality planning within the Air Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the project exceeds the assumptions used in preparing the forecasts presented in the 2016 AQMP. Determining whether a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

- a) *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

A project is consistent with the 2016 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the General Plan, the Southern California Association of Government's (SCAG's) Growth Management chapter of the Regional Comprehensive Plan (RCP), and SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS also provides socioeconomic forecast



projections of regional population growth. Additionally, the SCAQMD has incorporated these same projections into the 2016 AQMP.

The project site is currently designated Public/Quasi Public. Properties designated Public/Quasi Public are intended for “all public uses such as schools, and government offices and facilities, as well as quasi-governmental offices and facilities such as those for the telephone company and other utilities.” Per the City of Monrovia Zoning Ordinance, single family residential development is not a permitted use or a conditional use. The project includes a rezoning of the site to the Residential Foothill designation, which would allow construction of one dwelling unit per acre. Adjacent and immediately surrounding the site are single-family residential uses. Specifically, the southwest, south and east sides of the parcel are developed with one- and two-story single-family homes. Open space, including a steep hillside, exists immediately north of the project site.

While the site is designated for Public/Quasi Public use, there are no known plans by the City or other public entities to develop or plan public uses at the site. Due to the nature of surrounding land uses and the pattern of development, it is likely that the parcel was once owned by a public entity but then sold as a remnant parcel that was no longer needed for public use. As such and considering the surrounding residential development, it is logical to consider the site for residential use.

As noted, the project involves a zoning change to create a new residential hillside lot and construction of one single-family dwelling. As such, the project would introduce additional people residing at the site that are not currently allowed by the existing zoning. The population of the city in 2020 was estimated to be 37,935 people. Given the average household size is 2.65 people, the project would result in a direct increase in population of up to approximately 3 people. SCAG estimates the city’s projected population is approximately 39,300 persons in 2035. As such, the proposed population growth estimate for the project (3 persons) represents approximately 0.17 percent of SCAG’s projected population growth. For this reason, the project’s anticipated population growth of the project individually can be considered to be within SCAG’s population growth assumptions for the City.

Implementation of the project would not exceed the demographic growth forecasts in the SCAG; therefore, the project would also be consistent with the 2016 AQMP. Because the addition of project-generated residents to the city’s estimated population would not exceed the SCAG forecasted population, implementation of the project would not result in a conflict with, or obstruct implementation of, the applicable 2016 AQMP. Overall, it can be concluded that the project would be consistent with the General Plan and thus, 2016 AQMP projections.

b) *Would the project implement all feasible air quality mitigation measures?*

Compliance with all feasible emission reduction measures identified by the SCAQMD and the General Plan would be required. For this reason, the project would meet this 2016 AQMP consistency criterion.



- c) *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

As noted above, the emission projections in the 2016 AQMP are based on land use planning strategies set forth in the General Plan, SCAG's RCP, and the RTP/SCS. The project would serve to implement various City and SCAG policies. The project site is located within a developed portion of the city, and the project would be one residence surrounded by residential uses.

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Air Basin. The project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. Also, the project would be consistent with the goals and policies of the 2016 AQMP for control of fugitive dust. As discussed above, the project would also be consistent with SCAQMD and SCAG's goals and policies and is considered consistent with the 2016 AQMP. Impacts are concluded to be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Air pollutant emissions associated with construction of the project would be generated from the exhausts of construction equipment, hauling trucks, delivery trucks, and worker vehicles. Particulate matter emissions would result from soil movement and wind-blown dust from disturbed surfaces, and organic pollutant emissions would result from painting. Operational emissions would be minimal and typical of those of a single-family residence.

Criteria Pollutants

Ozone (O₃). O₃ occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric layer (the "good" O₃ layer) extends upward from about 10 to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O₃ is a photochemical pollutant and needs volatile organic compounds (VOCs), NO_x, and sunlight to form; therefore, VOCs and NO_x are O₃ precursors. To reduce O₃ concentrations, it is necessary to control the emissions of these O₃ precursors. Significant O₃ formation generally requires an adequate number of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O₃ concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O₃ in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O₃ (in the troposphere) can adversely affect the human respiratory system and other tissues. O₃ is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O₃.



Short-term exposure (lasting for a few hours) to O₃ at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Volatile Organic Compounds (VOCs). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O₃ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms VOC and ROG (see below) are often used interchangeably.

Reactive Organic Gases (ROG). Similar to VOCs, ROGs are also precursors in forming O₃ and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROGs and nitrogen oxides react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant.

Coarse Particulate Matter (PM₁₀). PM₁₀ refers to suspended particulate matter, which is smaller than 10 microns (or 10 one-millionths of a meter). PM₁₀ arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM₁₀ scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill [SB] 25).

Fine Particulate Matter (PM_{2.5}). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both state and federal PM_{2.5} standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new PM_{2.5} standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a Final Rule in the *Federal Register* that designates the Air Basin as a nonattainment area for federal PM_{2.5} standards. On June 20, 2002, CARB adopted amendments for statewide annual ambient particulate matter air quality standards. These standards were revised/established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.



Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95% of all CO emissions.

CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of carbon monoxide.

Nitrogen Dioxide (NO₂). NO_x are a family of highly reactive gases that are a primary precursor to the formation of ground-level O₃ and react in the atmosphere to form acid rain. NO₂ (often used interchangeably with NO_x) is a reddish brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO₂ occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO₂ can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO₂ concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO₂ may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Sulfur Dioxide (SO₂). SO₂ is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with SO_x and lead. Exposure of a few minutes to low levels of SO₂ can result in airway constriction in some asthmatics.

Table 4-2, South Coast Air Basin Attainment Status, lists the attainment status for criteria pollutants in the Air Basin. As shown in Table 4-2, the Air Basin is currently designated as nonattainment for O₃, PM₁₀, and PM_{2.5} under state standards. Under federal standards, the county is in nonattainment for O₃ and PM_{2.5}. The area is currently in attainment or unclassified status for all other ambient air quality standards.

**Table 4-2
South Coast Air Basin District Attainment Status**

Pollutant	California Attainment Status	Federal Attainment Status
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Nonattainment	Nonattainment
Particulate Matter (PM ₁₀)	Nonattainment	Attainment
Fine Particulate Matter (PM _{2.5})	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment
Lead	Attainment	Partial Nonattainment
Sulfates	Attainment	No Federal Standard



Pollutant	California Attainment Status	Federal Attainment Status
Hydrogen Sulfide	Attainment	No Federal Standard
Visibility	Unclassified	No Federal Standard

Source: SWCA Environmental Consultants (SWCA). 2021. *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*. August.

Short-Term Construction Impacts

Short-term air quality emissions are anticipated during project-related construction activities. Temporary air emissions would result from the following project-specific construction activities:

- particulate (fugitive dust) emissions from earthmoving activities;
- ROG emissions from application of surface coatings; and
- exhaust emissions from the grading/construction equipment and the motor vehicles of construction crews.

Construction activities are anticipated to begin in early April 2022 and would include site preparation, grading, building construction, paving, and architectural coating work. To provide a conservative analysis, it is assumed that certain construction phases (building construction and paving) occur at the same time, using the following schedule:

- Phase 1: Site Preparation, 1 week, 6 days/week
- Phase 3: Grading, 4 weeks, 6 days/week
- Phase 4: Building Construction, 52 weeks, 6 days/week
- Phase 5: Paving, 13 weeks, 6 days/week
- Phase 6: Architectural Coating, 1 week, 6 days/week

No demolition is required for the project, as the current land is unoccupied. Site preparation includes the removal of vegetation and grubbing. Extensive grading is necessary and would result in approximately 576 cubic yards of cut and 266 cubic yards of fill. Approximately 252 cubic yards of soil would be exported from the site. Grading activities would be short-term and would cease following the completion of the construction activities. Mobile source emissions would result from the use of construction equipment such as graders, dozers, forklifts, tractors, loaders, and backhoes. The assessment of construction air quality impacts considers each of these potential sources.

Construction emissions were estimated using the California Emissions Estimator Model version 2020.4.0 (CalEEMod) based on the construction information compiled for the project. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, and the amount of materials to be transported on- or off-site. Table 4-3, Estimated Project Construction Emissions, presents the project's anticipated daily short-term construction emissions for the summer and winter season. Emitted pollutants would include ROG/VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.



**Table 4-3
Estimated Project Construction Emissions**

Season	Pollutant (pounds/day)					
	ROG/VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Peak Daily Emissions	5.64	27.30	12.96	0.030	9.43	4.65
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: SWCA Environmental Consultants (SWCA). 2021. *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*. August.

As depicted in Table 4-3, construction-related emissions would not exceed the established SCAQMD significance thresholds for criteria pollutants. However, the project would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rules 402 and 403 (see Standard Condition [SC] AIR-1) which would further reduce construction emissions. SC AIR-1 requires the implementation of dust control measures and measure to cover and protect outdoor storage piles. Further, the project would be required to comply with SC AIR-2, which would require idling restrictions for diesel-powered vehicles. With implementation of Standard Conditions SC AIR-1 and SC AIR-2, impacts would be less than significant.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released into the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos-bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the CDOC Division of Mines and Geology,¹⁷ serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact regarding naturally occurring asbestos.

¹⁷ California Department of Conservation (CDOC). 2000. *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos*. CDOC Division of Mines and Geology. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/toxics/asbestos/ofr_2000-019.pdf. Accessed July 20, 2021.



Long-Term Operational Emissions

The following is an analysis of the project’s long-term operational emissions compared to the existing site conditions.

Existing Operational Emissions

The project site is currently undeveloped. It supports disturbed chaparral and coastal sage scrub as well as oak woodlands.

Project Operational Emissions

The project-generated operational emissions would be associated with mobile source emissions from motor vehicle use, energy emissions from energy consumption, and area sources generated by the use of natural gas-fired appliances, landscape maintenance equipment, consumer products, and architectural coatings. Long-term operational emissions attributable to the project are summarized in Table 4-4.

Mobile Source Emissions

Mobile source emissions include emissions from motor vehicles, including tailpipe and evaporative emissions. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. Project emissions were conservatively estimated based on default CalEEMod trip generation data for a single-family residence.

Based on CalEEMod defaults, the average daily trips generated for a single-family residence would range from approximate nine trips per day on weekdays and Saturdays to 10 trips per day on Sundays. As shown in Table 4-4, emissions generated by vehicle traffic associated with the project would not exceed SCAQMD significance thresholds. Impacts from mobile source air emissions would be less than significant and would not require mitigation.

**Table 4-4
Estimated Increase of Regional Operational Emissions**

Activity	Pollutant Emission (pounds per day)				
	ROG	NOx	CO	PM ₁₀	PM _{2.5}
Area	0.79	0.12	6.21	1.00	1.00
Energy	0.0008	0.0064	0.0027	0.0005	0.0005
Mobile	0.03	0.03	0.31	0.07	0.02
Peak Daily Emission (total operational)	0.82	0.15	6.53	1.07	1.02
SCAQMD Significance Thresholds	55	55	550	150	55
Threshold exceeded?	No	No	No	No	No

Source: SWCA Environmental Consultants (SWCA). 2021. *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*. August.



Area Source Emissions

Area source emissions would be generated from consumer products, architectural coatings, and landscaping of the residence. As shown in Table 4-4, area source emissions from the project would not exceed significance thresholds for ROG, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

Energy Use Emissions

Energy use emissions would be generated as a result of electricity and natural gas usage associated with the project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics for the residence. As shown in Table 4-4, energy source emissions from the project would not exceed significance thresholds for ROG, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

As shown in Table 4-4, the project's total operational emissions would not exceed SCAQMD significance thresholds. Thus, operational air quality impacts would be less than significant.

Air Quality Health Impacts

In accordance with the California Supreme Court decision for *Sierra Club v. County of Fresno* (S219783; December 24, 2018), this discussion has been included to disclose the potential human health impacts from the project's air emissions.

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individuals [for example age, gender]). In particular, O₃ precursors VOCs and NO_x affect air quality on a regional scale. Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, therefore, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, a project's less-than-significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD,¹⁸ the SCAQMD acknowledged it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD),¹⁹ SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

¹⁸ South Coast Air Quality Management District (SCAQMD). 2014. *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*. In the Supreme Court of California. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

¹⁹ San Joaquin Valley Air Pollution Control District (SJVAPCD). 2014. *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.



The SCAQMD acknowledges that health effects quantification from ozone, as an example, is correlated with the increases in ambient level of ozone in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient ozone levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's 2012 Air Quality Management Plan, a reduction of 432 tons (864,000 pounds) per day of NO_x and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce ozone levels at the highest monitored site by only 9 parts per billion. The SCAQMD concludes that it is not currently possible to accurately quantify ozone-related health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations.

The federal ambient air quality standards (i.e., NAAQS) were established to protect public health, particularly sensitive populations (e.g., asthmatics, children, and the elderly). The health risks associated with exposure to criteria pollutants are evaluated on a regional level, based on the region's attainment of the NAAQS. Thus, the SCAQMD's regional thresholds were set at emission levels tied to the region's attainment status. Therefore, since the project would not exceed SCAQMD regional thresholds for construction or operational air emissions, it can be reasonably inferred that the project would not result in air quality health impacts.

Cumulative Impacts

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to federal Clean Air Act mandates. The project would implement SC AIR-1, which requires compliance with SCAQMD Rule 403 requirements. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the project. In addition, the project would comply with adopted 2016 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects throughout the Air Basin would be required to comply with these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted 2016 AQMP emissions control measures).

If emissions exceed the thresholds shown in Tables 4-3 and 4-4 for nonattainment pollutants (O₃, with O₃ precursors NO_x and VOCs, PM₁₀, and PM_{2.5}), the project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant impact on the ambient air quality. However, as shown in Tables 4-3 and 4-4, project emissions would not exceed the significance thresholds and therefore would not result in a cumulatively significant increase of any nonattainment criteria pollutant. Impacts would be less than significant.

The project construction and operations would not result in a significant air quality impact, as emissions would not exceed the SCAQMD adopted significance thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the project would not contribute to a cumulatively considerable net increase of any non-attainment criteria pollutant. Therefore, cumulative construction and operational impacts associated with implementation of the project would be less than significant.



Standard Conditions:

SC AIR-1 Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the project stipulates that, in compliance with SCAQMD Rule 402 and Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rules 403 and 402 are as follows:

- The Project Construction Contractor shall develop and implement dust control methods that shall achieve this control level in a SCAQMD Rule 403 dust control plan, designate personnel to monitor the dust control program, and order increased watering, as necessary, to ensure a 55% control level. Those duties shall include holiday and weekend periods when work may not be in progress. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following:
 - Apply water twice daily, or nontoxic soil stabilizers according to manufacturer's specifications, to all unpaved parking or staging areas or unpaved road surfaces or as needed to areas where soil is disturbed.
 - Use low-sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2.
 - During earthmoving or excavation operations, fugitive dust emissions shall be controlled by regular watering to prevent excessive amounts of dust, ceasing earthmoving and excavation activities during periods of high winds (i.e., winds greater than 20 miles per hour [mph] averaged over 1 hour), and minimizing the area disturbed by earthmoving or excavation operations at all times.
 - After earthmoving or excavation operations, fugitive dust emissions shall be controlled by revegetating and watering portions of the construction area to remain inactive longer than a period of 3 months and watering all active portions of the construction site.
 - At all times, fugitive dust emissions shall be controlled by limiting the on-site vehicle speed to 15 mph and paving road improvements as soon as feasible.
 - At all times during the construction phase, ozone precursor emissions from mobile equipment shall be controlled by maintaining equipment engines in good condition and in proper tune according to manufacturers' specifications.



- Outdoor storage piles of construction materials shall be kept covered, watered, or otherwise chemically stabilized with a chemical wetting agent to minimize fugitive dust emissions and wind erosion.

SC AIR-2 Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the project complies with Mitigation Measure AIR-C of the *Final Environmental Impact Report, Monrovia General Plan Proposed Land Use and Circulations Elements* (dated January 2008) to reduce diesel engine emissions of ozone precursors ROGs and NOx, particulate matter less than 10 microns in size (PM₁₀), particulate matter less than 2.5 microns in size (PM_{2.5}), and diesel particulate matter.

- Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:
 - When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
 - When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
 - To bring the equipment to the manufacturers' recommended operating temperature;
 - When the ambient temperature is below 40 degrees Fahrenheit (°F) or above 85°F; or when equipment is being repaired.

Mitigation Measures: No mitigation measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses.²⁰ Examples of these sensitive receptors are residences, schools, hospitals, daycare centers, and places of worship. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

Sensitive receptors near the project include existing one- and two-story single-family homes on the southwest, south, and east sides of the parcel. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for

²⁰ Per the definition in the SCAQMD *Final Localized Significance Threshold Methodology*, revised July 2008, and various SCAQMD Rules (such as Rule 1470, paragraph [b][60]).



construction and operation impacts (stationary sources only). The CO hotspot analysis following the LST analysis addresses localized mobile source impacts.

Localized Significance Thresholds

LSTs were developed in response to SCAQMD Governing Boards’ Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology*, dated June 2003 (revised 2008), for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific level projects. The SCAQMD provides the LST lookup tables for 1-, 2-, and 5-acre projects emitting CO, NO_x, PM_{2.5}, or PM₁₀ for 41 different Source Receptor Areas (SRAs) throughout the Air Basin. The project site is located within SRA 9, East San Gabriel Valley.

Construction

Based on the SCAQMD guidance on applying CalEEMod to LSTs, the project would disturb approximately 2 acres of land per day. Therefore, the LST screening thresholds for 2 acres were used for the construction LST analysis. To be conservative, the LST value for 25 meters was used. Table 4-5 shows the localized construction-related emissions. Note that the localized emissions presented in Table 4-5 are less than those in Table 4-3, as localized emissions include only on-site emissions (e.g., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As seen in Table 4-5, on-site emissions would not exceed the LST screening thresholds for SRA 9. Therefore, impacts would be less than significant.

As detailed in Table 4-5, construction emissions for NO_x, CO, PM₁₀ and PM_{2.5} would not exceed the SCAQMD LST screening thresholds for any construction phase. Therefore, the project would result in a less than significant impact related to sensitive receptors, due to localized construction emissions.

**Table 4-5
Localized Short-Term Construction Emissions**

Emissions Source ¹	Pollutant (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site preparation	24.72	9.83	4.45	2.51
Grading	26.61	12.09	4.76	2.63
Building construction	7.54	4.87	0.35	0.33
Paving	4.14	5.43	0.20	0.19
Architectural coating	1.74	2.41	0.09	0.09
SCAQMD LST Screening Thresholds²	128	786	7	5
Threshold Exceeded?	No	No	No	No



Emissions Source ¹	Pollutant (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}

Notes:

1. Emissions were calculated using CalEEMod (CalEEMod version 2020.4.0).
2. The Localized Significance Thresholds (LSTs) were determined using Appendix C of the SCAQMD's *Final Localized Significant Threshold Methodology*, revised July 2008, for pollutants NO_x, CO, PM₁₀, and PM_{2.5}. The LST was based on the anticipated daily acreage disturbance for construction (2 acres; therefore the 2-acre threshold was used) and SRA 9.

Source: SWCA Environmental Consultants (SWCA). 2021. *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*. August.

Diesel Particulate Matter

Emissions of diesel particulate matter associated with heavy-duty construction equipment are a toxic air contaminant (TAC). Diesel particulate matter is mainly composed of particulate matter (i.e., PM_{2.5}) and gases, which contain potential cancer-causing substances. The majority of heavy-duty equipment construction activity would occur during the grading and site preparation phases. As shown in Table 4-5, PM_{2.5} emissions from construction activities are well below the SCAQMD significance threshold. As construction activities would be short-term, operation of heavy-duty construction equipment is not expected to expose sensitive receptors to substantial diesel particulate matter concentrations. As such, impacts would be less than significant.

Operations

As shown in Table 4-6, Localized Significance of Operational Emissions, the project's operational emissions would not exceed the LST screening thresholds for the nearest sensitive receptors in the project vicinity. It should be noted the localized operational CalEEMod results do not include off-site mobile emissions per SCAQMD guidance. As detailed in Table 4-6, daily operational emissions for NO_x, CO, PM₁₀, and PM_{2.5} would not exceed the SCAQMD LST screening thresholds. Therefore, impacts would be less than significant.

**Table 4-6
Localized Significance of Operational Emissions**

Emissions Source ¹	Pollutant (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area source	0.115	6.22	1.00	1.00
Energy consumption	0.0064	0.0027	0.0005	0.0005
Total Project Operational Emissions	0.121	6.223	1.001	1.001
SCAQMD LST Screening Thresholds	128	953	2	2
Threshold Exceeded?	No	No	No	No



Emissions Source ¹	Pollutant (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}

Notes:

1. Emissions were calculated using CalEEMod (CalEEMod version 2020.4.0).
2. The Localized Significance Thresholds (LSTs) were determined. The LST was based on the anticipated daily acreage disturbance for construction (2 acres; therefore the 2-acre threshold was used) and SRA 9.

Source: SWCA Environmental Consultants (SWCA). 2021. *Air Quality & Greenhouse Gas Technical Report, Norumbega Drive Residence Project, Los Angeles County, California*. August.

Carbon Monoxide Hotspots

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO “hot spots.” It is not anticipated that the project would have a significant impact on traffic in the area as it is a single-family residence. Therefore, CO hotspot impacts would be less than significant.

Air Quality Health Impacts

As evaluated above, the project’s localized emissions would not exceed the SCAQMD’s LST screening thresholds. Therefore, the project would not exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM₁₀, or PM_{2.5}, which were developed to represent levels at which the most susceptible persons (children and the elderly) are protected from health effects. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect sensitive populations with respiratory problems (e.g., children, the elderly, etc.). The project’s localized emissions would not create an air quality health impact, and a less than significant impact would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. According to the SCAQMD’s *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.²¹ The project does not include any of these uses or odor sources. However, certain odors may emanate from construction operations if diesel-powered construction equipment is used during the construction period for the project. These odors would be limited to the construction period and would disperse quickly; therefore, these odor impacts would be less than significant.

The project is a single-family residence with no odorous sources. For this reason, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

²¹ South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*.



4.4 Biological Resources

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

A biological technical report and an Arborist Report were prepared for this project and were used to inform this analysis (refer to Appendix D²² and Appendix E²³).

²² Hamilton Biological. 2020. Revised Biological Assessment. APN: 8523-002-045, Norumbega Drive, City of Monrovia, Los Angeles County, California. September 9.

²³ Rebecca Latta Arboricultural Consulting. 2020. *Arborist Report. Norumbega Drive (APN: 8523-002-045)*. Glendora, CA. April 13.



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

Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in regional or local plans, policies, or regulations, or by the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW).

The assessment contained in the biological technical report (see Appendix D) included the project area and the area immediately adjacent to the site (see Figure 2-2, Site Vicinity). The arborist survey included the project site and a 50-foot buffer area surrounding the property. The property occupies a steep, southeast-facing slope in an existing hillside residential neighborhood. Elevation ranges from approximately 823 feet above mean sea level (amsl) at Norumbega Drive to 978 feet amsl at the northern property boundary. No streambeds or seasonal drainage courses occur on the project site.

The property supports oak woodland and disturbed chaparral/coastal sage scrub. Approximately 1.12 acre of the property supports disturbed chaparral/coastal sage scrub which is dominated by fountain grass (*Pennisetum setaceum*) with scattered castor bean (*Ricinus communis*); these are non-native, invasive plants found in areas with a history of disturbance. The site has been subject to repeated spraying for weeds, every 2 months, as required by the City for fire safety. Additional non-native species identified in the disturbed chaparral/coastal sage scrub included shortpod mustard (*Hirschfeldia incana*), petty spurge (*Euphorbia peplus*), henbit (*Lamium amplexicaule*), and bur chervil (*Anthriscus caucalis*). Native species identified in the disturbed chaparral/coastal sage scrub include native shrubs such as laurel sumac (*Malosma laurina*), redberry (*Rhamnus crocea*), chamise (*Adenostoma fasciculatum*), wishbone bush (*Mirabilis californica*), sweetbush (*Bebbia juncea*), and white sage (*Salvia apiana*); native forbs and vines including wild cucumber (*Marah macrocarpa*), deerweed (*Acmispon glaber*), mustard evening-primrose (*Eulobus californicus*), showy penstemon (*Penstemon spectabilis*), common sunflower (*Helianthus annuus*), and red-gland spurge (*Euphorbia melanadenia*). The southwestern part of the site supports approximately 0.17 acre of oak woodland, dominated by the native coast live oak (*Quercus agrifolia*). An isolated coast live oak also occurs in the middle of the property. The understory of the oak woodland includes such native species as coffeeberry (*Frangula californica*), two-color rabbit-tobacco (*Pseudognaphalium biolettii*), Douglas's nightshade (*Solanum douglasii*), and canyon sunflower (*Venegasia carpesioides*). Non-native species observed in the oak woodland included hairy beggarticks (*Bidens pilosa*), garden nasturtium (*Tropaeolum majus*), and smilo grass (*Stipa miliacea*).

Two lizard species, the side-blotched lizard (*Uta stansburiana*) and western fence lizard (*Sceloporus occidentalis*), were observed on the site. Nineteen bird species were observed, including red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), Bewick's wren (*Thryomanes bewickii*), house finch (*Haemorhous mexicana*), lesser goldfinch (*Spinus psaltria*), and rufous-crowned sparrow (*Aimophila ruficeps*). One species of mammal was observed, the California ground squirrel (*Otospermophilus beecheyi*), as well as the holes of Botta's pocket gopher (*Thomomys bottae*).



A literature review and database search for special-status plant and wildlife species identified 20 special-status plant species and 12 special-status wildlife species within a 5-mile search radius surrounding the project area shown in Figure 2-2, Site Vicinity (see Appendix D, Revised Biological Assessment, for details of the desktop review). None of these species were observed, however, five reptile species (coast [Blainville's] horned lizard [*Phrynosoma blainvillii*], coastal whiptail [*Aspidoscelis tigris stejnegeri*], Southern California legless lizard [*Anniella stebbinsi*], California glossy snake [*Arizona elegans occidentalis*], and coast patch-nosed snake [*Salvadora hexalepis virgultea*]) had a moderate or higher potential to occur in the project area. In addition, three special-status bird species (northern harrier [*Circus hudsonius*], loggerhead shrike [*Lanius ludovicianus*], and Oregon vesper sparrow [*Pooecetes gramineus affinis*]) are expected to occur during migration and possibly winter but are not expected to nest on the site (Table 4-7, Special-Status Species with Moderate or High Potential to Occur On-site).

**Table 4-7
Special-Status Species with Moderate or High Potential to Occur On-site**

Common Name	Scientific Name	Federal / State Status	Potential to Occur
Reptiles			
Coast (Blainville's) horned lizard	<i>Phrynosoma blainvillii</i>	-- ¹ / SSC ²	Moderate potential to occur on property due to site disturbance
Coastal whiptail	<i>Aspidoscelis tigris stejnegeri</i>	-- / SSC	High potential to occur on property; tolerant of disturbance
Southern California legless lizard	<i>Anniella stebbinsi</i>	-- / SSC	Moderate potential to occur on property in oak woodland
California glossy snake	<i>Arizona elegans occidentalis</i>	-- / SSC	Moderate potential to occur on property due to site disturbance
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	-- / SSC	Moderate potential to occur on property due to site disturbance
Birds			
Northern harrier	<i>Circus hudsonius</i>	-- / SSC	Expected to occur occasionally during migration and possibly winter
Loggerhead shrike	<i>Lanius ludovicianus</i>	-- / SSC	Potentially occurs occasionally during migration and possibly winter
Oregon vesper sparrow	<i>Pooecetes gramineus affinis</i>	-- / SSC	Potentially occurs occasionally during migration and possibly winter

Notes:

1. Not listed
2. SSC = California Species of Special Concern. The CDFW has designated certain vertebrate species as Species of Special Concern because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

Source: Hamilton Biological. 2020. *Revised Biological Assessment*, APN: 8523-002-045, Norumbega Drive, City of Monrovia, Los Angeles County, California. September 9.



Special-Status Reptiles

The Coast horned lizard, also known as Blainville's horned lizard, is a highly cryptic, flat-bodied lizard typically found in open areas with low vegetation and along unpaved roads in a wide range of habitats, including grasslands, coniferous forests, woodlands, and chaparral. The species' range extends from the northern portions of the Central Valley to Baja California. Little is known about the home ranges for the species; however, horned lizards generally lack territorial defense.²⁴ Coast horned lizards are ant specialists, primarily feeding on native harvester ants (*Pogonomyrmex* spp.) and may often be found feeding near anthills. Due to its highly cryptic appearance and behavior, the species often goes unnoticed. However, local records, such as those in listed iNaturalist, indicate that individuals are regularly observed throughout foothills of the San Gabriel Mountains. The chaparral/coastal sage scrub habitat is suitable for the species, but coast horned lizard has a moderate potential for occurrence due to the existing site disturbance.

The Coastal whiptail is an extremely active diurnal lizard found in hot, dry, open areas with sparse vegetation, typically in chaparral, woodland, and riparian habitats. It is found in the inland and coastal regions of southern California. The species is frequently observed in the San Gabriel Mountains and in other natural areas in the vicinity of the project area. The Coastal whiptail is generally tolerant of disturbance and suitable habitat is present throughout the project area. The Coastal whiptail has a high potential for occurrence.

The Southern California legless lizard is typically found in moist, warm loose soils with sparse plant cover in southern California. Its range extends from the coastal regions of Santa Barbara County to Baja California and to the inland portions of Riverside County. It may also be found in suburban gardens. The oak woodland habitat and soil quality throughout the project area is suitable for the species. The Southern California legless lizard has a moderate potential for occurrence.

The California glossy snake is a medium-sized snake that occurs in sagebrush, grasslands, and chaparral slopes with sparse shrubs and friable soils. This subspecies ranges from Central California to Baja California. It is distinguished by its smooth, shiny scales that are tan with dark blotches. The habitat within the project area is suitable for the species. While the project area is within the known range of the species, there are few local records found in the vicinity of the project area. Local records of California glossy snake are located in the northern portions of the San Gabriel Mountains. Based on the habitat suitability and known range, the California glossy snake has a moderate potential for occurrence.

The Coast patch-nosed snake is a slender, striped snake found in semi-arid brushy areas, chaparral in canyons, rocky hillsides, and grasslands. This species ranges from San Luis Obispo County to Baja California. Coast patch-nosed snake is diurnal and primarily feeds on lizards, especially whiptails, along with small mammals, other snakes, reptile eggs, and amphibians. Local records in iNaturalist indicate that the species is regularly observed in the San Gabriel Mountains. Habitat within the project area is suitable for this species. The Coast patch-nosed snake has a moderate potential for occurrence.

²⁴ California Department of Fish and Wildlife (CDFW). 2000. *Life History Account for Blainville's Horned Lizard*. California Wildlife Habitat Relationship Systems. California Department of Fish and Wildlife. California Interagency Wildlife Task Group.



Apart from the California glossy snake, the reptile species described above are locally common. The project area is relatively disturbed and represents a negligible portion of the overall range of each species. Direct impacts to these species, if present, could include being hit by vehicles on access roads and on the project site; crushing during site preparation, and preparation of staging locations; and general disturbance due to increased human activity. In addition, project implementation may result in temporary loss of habitat from construction activities, and permanent loss of habitat due to permanent structures and/or roads. However, all five species have relatively large ranges and are not considered highly imperiled. Therefore, the project would not have a substantial effect on these species. Additionally, the pre-construction survey described below in Mitigation Measure BIO-1 would reduce impacts to less than significant.

Nesting Birds

The existing oak woodland could provide nesting opportunities for birds. The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. To reduce potential impacts to nesting birds, Mitigation Measure BIO-2 requires a pre-construction nesting bird clearance survey to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. If the nesting bird clearance survey indicates the presence of nesting birds, Mitigation Measure BIO-2 requires buffers to ensure that any nesting birds are protected pursuant to the MBTA. With implementation of Mitigation Measure BIO-2, the project's potential construction-related impacts to migratory birds would be reduced to less than significant.

Implementation of the project has the potential to impact birds that are nesting at the project site directly, by causing active nests to fail. The project has suitable nesting habitat for the numerous common bird species observed during the field survey. The shrubs provide suitable nest sites for common avian species, such as California scrub-jay (*Aphelocoma californica*) and northern mockingbird (*Mimus polyglottos*). The trees provide suitable nest sites for species such as woodpeckers, bushtit (*Psaltriparus minimus*), and raptors. Implementation of the mitigation measures below would minimize impacts to nesting birds to less than significant.

Special-Status Birds

Some special-status birds, such as northern harrier, loggerhead shrike, and Oregon vesper sparrow may be present during migration or during winter. However, these species do not have the potential to nest at the site. Birds that do not have the potential to nest in the project area are not anticipated to be directly impacted by the project. Because of their mobility, birds generally move out of harm's way and would not be injured or killed during grading, construction, or project operations. Implementation of the project would reduce foraging habitat for these species, but specific measures for these species are not required to avoid direct impacts. Impacts to non-nesting birds would be less than significant.

In conclusion, implementation of Mitigation Measures BIO-1 and BIO-2 would reduce impacts to the species identified in the discussion above to less than significant.



Mitigation Measures:

BIO-1 No more than 30 days prior to initial vegetation clearance, grubbing, or ground-disturbing activities, a wildlife biologist shall conduct a pre-construction survey to identify whether any special-status terrestrial wildlife are present at the project site. In the event of the discovery of any special-status reptiles, the biologist shall recover and relocate the animal(s) to adjacent suitable habitat within the project site at least 200 feet from the limits of grading.

BIO-2 In the event that vegetation and tree removal or trimming should occur between February 1 and September 15, the Project Sponsor shall retain a qualified biologist to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. Results of the pre-construction survey shall be submitted to the City's Planning Division prior to the commencement of construction activities and the issuance of any permits. The biologist conducting the clearance survey shall document the negative results if no active bird nests are observed on the project site or within the vicinity during the clearance survey with a brief letter report, submitted to the City's Planning Division prior to construction, indicating that no impacts to active bird nests would occur, before construction can proceed. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 300-foot buffer around the active nest. For listed raptor species, this buffer shall be 500 feet. If active nests are determined to be present, a biological monitor shall be on-site to delineate the boundaries of the buffer area and to monitor the active nest at least twice weekly to ensure that nesting behavior is not adversely affected by construction activity or until construction activity is completed, whichever comes first. Monitoring activities shall be reported to the City's Planning Division for review and approval monthly until nesting behavior is not adversely affected by construction activity or construction activity is completed, whichever comes first.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?

No Impact. Riparian habitats are those occurring along the banks of rivers, streams, lakes, and other surface water bodies. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. The Sawpit Wash is a concrete-lined flood control channel identified as riverine habitat on USFWS's National Wetlands Inventory web mapping application.²⁵ As the Sawpit Wash is located approximately 350 feet southwest of the project site, it is not within, nor in the immediate vicinity of, the proposed limits of disturbance for project construction and operation.

The approximate 1.3-acre project site consists mainly of highly disturbed chaparral/coastal sage scrub (1.17 acre) plus 0.13 acre of somewhat disturbed oak woodland. No riparian or other sensitive natural communities are located in the site. Thus, no impacts would occur.

²⁵ U.S. Fish and Wildlife Service (USFWS). 2020. National Wetlands Inventory. Available at: <https://www.fws.gov/wetlands/data/mapper.html>. Accessed November 6, 2020.



Mitigation Measures: No mitigation measures are required.

- c. **Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. Refer to Response 4.4(b). No wetland features are located on-site.²⁶ The project site is not located near any marsh, vernal pool, or coastal wetlands, and no hydrology, soils, or vegetation occur on-site that could constitute or support wetlands. In addition, pursuant to Municipal Code 15.28.050, the project would be required to obtain an erosion control permit for any grading that occurs, or unprotected graded surface that remains, during the period of October 15 through April 15. The best management practices (BMPs) required in the erosion control permit would reduce impacts to Sawpit Wash from construction-related runoff to less than significant.

Mitigation Measures: No mitigation measures are required.

- 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 site?**

Less Than Significant Impact. No identified wildlife corridors or native wildlife nurseries occur within the boundaries of the project site. The project site is very steep and lies on the edge of the urban/wildland interface. Based on its topography and position relative to existing development in the city of Monrovia, the site does not serve as a significant wildlife movement corridor for any terrestrial wildlife species through the local area or wider region. No impact to migratory wildlife corridors would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. Coast live oak trees (*Quercus agrifolia*) are protected under the City of Monrovia Oak Tree Preservation Ordinance. According to the City of Monrovia Oak Tree Preservation Ordinance (17.20.40 of the Monrovia Municipal Code) all coast live oak on vacant lots that are 10 inches in diameter or more when measured at 2 feet above the level ground are protected.

An Oak Tree Preservation Permit would be required for the project in compliance with Section 17.20.40 of the Monrovia Municipal Code. The permit is required from the City prior to removal, pruning of one-third of the crown or root system, or if irrigation is installed or grading takes place within the dripline of a protected oak.

The Arborist Report (Appendix E) identifies seven protected coast live oak on the parcel. Since publication of the Arborist Report, the tree identified as Tree #3 was removed due to its unhealthy condition. This removal was appropriately permitted through the city (City of

²⁶ U.S. Fish and Wildlife Service (USFWS). 2020. National Wetlands Inventory. Available at: <https://www.fws.gov/wetlands/data/mapper.html>. Accessed November 6, 2020.



Monrovia 2020b).²⁷ Thus, six protected coast live oak occur on the parcel. In addition, one protected coast live oak occurs on the western adjacent parcel and the dripline overhangs the project parcel. Development would occur within the dripline of two oak trees.

While no oak trees would be removed with implementation of the project, the proposed retaining wall in the southwestern corner of the property would impact the roots and canopy of two of the oak trees. Specifically:

- The coast live oak tree identified as Tree #1 in Figure 4-1, Oak Tree Survey and Assessment, could have up to 20% of the root system and 10% of the canopy removed during project construction.
- Tree #2 (see Figure 4-1) could have up to 40% of the root system and 10% of the canopy removed during project construction.

Site grading and construction has the potential to affect the health of the oak trees through this direct report of root and canopy and could also result in additional unanticipated impacts during the construction process. Implementation of Mitigation Measure BIO-3 would reduce impacts to less than significant.

These measures are consistent with the recommended measures in the Arborist Report (see Appendix E).²⁸

²⁷ When the Arborist Report (Rebecca Latta Arboricultural Consulting 2020) was completed, a total of seven oak trees were present at the site. However, the oak tree identified as Tree #3 in the Arborist Report was removed after the Arborist Report was finalized. The removal was authorized by the City of Monrovia in November 2020, pursuant to Oak Tree Preservation Permit MISC2020-0007 (City of Monrovia 2020b).

²⁸ Rebecca Latta Arboricultural Consulting. 2020. *Arborist Report. Norumbega Driver (APN: 8523-002-045)*. Glendora, CA. April 13.



Figure 4-1 Oak Tree Survey and Assessment



Mitigation Measures:

- BIO-3** The following measures shall be implemented to protect the coast live oak trees prior to and during the construction process. Numbering reference for the oak trees corresponds with the numbering in the Arborist Report and as shown on Figure 4-1 of this Initial Study/Mitigated Negative Declaration. All work shall be overseen by a certified arborist, who will serve as the arborist for the project (project arborist).
- a. Prior to construction, protective fencing shall be erected for all oak trees on the site
 - i. Protective fencing for Tree #1 and Tree #2 shall be surrounding the base out at least two-thirds of the total drip line during construction. When installing fencing, the footing locations in the protected zone shall be carefully pre excavated using an Airspade™ to identify roots prior to construction and determine if fence post locations need to be adjusted to avoid large roots. This work shall be observed by the project arborist. All spoils from digging shall be placed on ¾-inch plywood or outside the protected zone of the trees.
 - ii. For Tree #4 through Tree #7, the fencing shall be installed 5 feet outside the canopy edge and shall be installed and inspected by the project arborist prior to the beginning of work on the site.
 - iii. Tree protection fencing should be a chain-link fence with an access gate at least 4 feet high with 2 × 6-inch steel posts installed at 8 feet on center. Post locations shall be installed under observation by the project arborist to avoid root damage. The fencing shall incorporate retroreflective signing that is a minimum of 8.5 × 11 inches and spaced a maximum of every 100 feet along each fence perimeter. The signs shall state “TREE PROTECTION ZONE” and provide the name and contact information of project owner or authorized representative.
 - iv. No mitigation applies to Tree #3, as identified in the 2020 Arborist Report (Appendix E). Tree #3 has been removed from the site with appropriate City approvals; this occurred after the Arborist Report was published.
 - b. Before the start of construction, the project arborist shall meet on-site with the construction lead to verify that the protective fencing described in the protective measures is in place and to sign an acknowledgement that the Project Sponsor has read and understands the tree protection measures for the project.
 - c. Trees #1 and #2 shall be pruned under the direction of the project arborist using Best Management Pruning Practices (2008) part of ANZI A300 or equivalent. The dead wood shall be removed, and the canopy shall be reduced on the outer two-thirds of area as it extends towards the street to prevent the branches from falling into the street. The tree has a codominant structure and needs to have a central leader encouraged.



- d. The project shall avoid mechanical injury and compaction to roots, root flares, trunks, and branches under the dripline of any tree to be retained. A certified arborist shall be present to observe the area with the roots exposed, prior to undertaking any root pruning or grading.
- e. No construction staging, washout, or disposal of construction materials or byproducts shall be placed within the tree protection zones. Equipment shall not idle under, nor shall oil, gas, chemical, or other construction materials be stored in, the drip line of any trees.
- f. Signs, wires, or any type of obstruction shall not be attached to trees.
- g. The tree/root protection zone shall be irrigated sufficiently with clean, potable water to keep the tree in good health and vigor before, during, and after construction. Trees shall be soaked so that water reaches a depth of 2 to 3 feet monthly, starting 2 to 6 months prior to construction.
- h. During project construction, mulch and compost shall be applied around the trees once every 6 months. Wood chip mulch shall be applied over the soil surface soil to 4 inches deep to preserve moisture and improve soil condition.
- i. Protected trees damaged by construction shall be repaired in accordance with accepted arboriculture methods by a tree specialist. The project arborist shall determine when repair is required.

f. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The property does not occur within a Los Angeles County Significant Ecological Area, Habitat Conservation Plan or Natural Communities Conservation Plan area, or other local or regional conservation planning area, and implementation of the project would not have a significant adverse effect on local or regional planning efforts. No impact would occur.

Mitigation Measures: No mitigation measures are required.



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4.5 Cultural Resources

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		✓		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		✓		
c. Disturb any human remains, including those interred outside of dedicated cemeteries?		✓		

Desktop analysis of the project site and surrounding 0.5-mile radius consisted of a records search of the California Historical Resources Inventory System (CHRIS) at the South Central Coast Information Center (SCCIC) and a Sacred Lands File (SLF) search by the Native American Heritage Commission (NAHC). The CHRIS records search was completed to identify previous cultural resources studies and previously recorded cultural resources within a 0.5-mile radius of the project site. The SLF search was completed to identify any locations deemed sacred and/or tribal cultural resources by local Native American tribes. The CHRIS search results were provided on August 25, 2021, and included a review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Points of Historical Interest list, California Historical Landmarks list, Archaeological Determinations of Eligibility list, and California State Historic Resources Inventory list. The records search also included a review of all available historical U.S. Geological Survey (USGS) 7.5-, 15-, and 30-minute quadrangles. No known cultural resources listed or eligible for listing in a State or local register of historic resources have been identified within the project site.

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

Less Than Significant Impact With Mitigation Incorporated. The results of the CHRIS records search indicated that no cultural resources, including those listed or eligible for listing in a State or local register of historic resources, have been identified within the project site. Analysis of historical USGS quadrangles and aerial photography did not identify any historic-age (i.e., 45 years or older) or modern built environment buildings, structures, or objects within the project site. One historic-age built environment resource (P-19-004717 [Spanish Canyon Motorway]) was identified within a 0.5-mile radius of the project site. The historic-age Spanish Canyon Motorway (P-19-004717) is located approximate 0.24-mile northeast of the project site and would not be subject to any direct or indirect (e.g., visual or vibrational) impacts. As a result of the negative records search and lack of impacts to the historic-age Spanish Canyon Motorway (P-19-004717), the project would not cause an adverse change in the significance of a historical resource.



A total of four cultural resource investigations have been completed within a 0.5-mile radius of the project site between 1976 and 1995. None of the investigations include the project site. Although the records search did not identify any cultural resources within or adjacent to the project area, the project area has not been previously surveyed to determine the presence of archaeological resources.

While the record searches did not identify any cultural resources within or adjacent to the project area, the proposed earthwork for the project would involve ground-disturbing activities within an undeveloped area. Therefore, project construction has the potential to uncover previously undiscovered historical resources. The implementation of Mitigation Measure CUL-1 would reduce impacts to unknown historical resources to less than significant. Refer to Section 4.18, Tribal Cultural Resources, for additional information regarding use of Native American monitors and identified mitigation measures.

Mitigation Measures:

CUL-1 Prior to issuance of grading permits, a qualified archeologist meeting the Secretary of the Interior's Professional Qualifications Standards, and a Native American monitor shall be retained to monitor all ground-disturbing activities. Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. A sufficient number of archaeological and Native American monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The qualified archaeologist and Native American monitors shall have the ability to recommend, with written and photographic justification, the termination of monitoring efforts to the City, and should the City and the Native American participant(s) concur with this assessment, then monitoring shall cease.

Prior to construction, a qualified archaeologist shall present a Worker Environmental Awareness Program (WEAP) training in cooperation with the Native American monitor. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural and tribal cultural resources. The WEAP will also cover the proper procedures in the event an unanticipated cultural or tribal cultural resource is identified during construction. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the project. A cursory shall be by the archaeological and Native American monitors completed following vegetation removal.

If previously unidentified cultural or tribal cultural resources are encountered during the cursory investigation and/or during ground-disturbing activities, the archaeological and Native American monitors shall have the authority to halt ground-disturbing activities within 100 feet of the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation shall be established. If prehistoric or potential tribal cultural resources are identified, Mitigation Measure TCR-1, as outlined in Section 4.18, shall be implemented.



The qualified archaeologist, in consultation with the City (and Native American participant[s] should the find be prehistoric), shall determine whether the resource is potentially significant in accordance with Section 15064.5 of the CEQA Guidelines (that is, whether it is a historical resource, a unique archaeological resource, or tribal cultural resources). If avoidance is not feasible, a qualified archaeologist, in consultation with the City and Native American participant(s), should the find be prehistoric, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, and excavation.

In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the City's Planning Division who will consult with the Native American participant(s), as outlined in Mitigation Measure TCR-1. No work will continue within the ESA until the qualified archaeologist, and City (along with the Native American participant[s] should the find be prehistoric) agree to and complete the appropriate treatment, and states in writing that the proposed construction activities would not significantly damage any archaeological resources.

The archaeological and Native American monitors shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified.

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

Less Than Significant Impact With Mitigation Incorporated. While the record searches did not identify any archaeological resources within or adjacent to the project area, the proposed earthwork for the project would involve ground-disturbing activities within an undeveloped area. Therefore, project construction has the potential to uncover previously undiscovered archaeological resources. The implementation of Mitigation Measure CUL-1 would reduce impacts to unknown archaeological resources to less than significant.

Mitigation Measures: Refer to Mitigation Measure CUL-1.

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

Less Than Significant Impact With Mitigation Incorporated. No human remains have been recorded within the project site, including those interred outside of formal cemeteries; however, the discovery of human remains during project construction is always a possibility. Implementation of Mitigation Measure CUL-2 would reduce impacts related to the disturbance of human remains to less than significant.

Mitigation Measures:

CUL-2 If human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Health and Safety Code Sections 7050.5 through 7055 describe the general provisions for human remains.



Specifically, Health and Safety Code Section 7050.5 requires if any human remains are accidentally discovered during excavation of a site, the County Coroner shall be notified of the find immediately, and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. As required by State law, if the remains are determined to be Native American, the County Coroner shall notify the NAHC, which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC and shall have the opportunity to offer recommendations for the disposition of the remains.



4.6 Energy

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Regulatory Setting

State

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6), commonly referred to as “Title 24,” became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings would use about 30% less energy, mainly due to lighting upgrades, when compared to those constructed under 2016 Title 24 standards.²⁹ The 2019 Title 24 standards require installation of energy-efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen)

The CALGreen Code (CCR Title 24, Part 11), is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into effect on January 1, 2020. CALGreen requires new buildings to reduce water consumption by 20%, divert 50% of construction waste from landfills, and install low pollutant-emitting materials.

²⁹ California Energy Commission. *2019 Building Energy Efficiency Standards*. March 2018. Available at: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed August 22, 2021.



Senate Bill 100

SB 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024; 52% by December 31, 2027; 60% by December 31, 2030; and 100% by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), CARB, and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to use programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every 4 years thereafter, that includes specified information relating to the implementation of SB 100.

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared the *Long Term Energy Efficiency Strategic Plan* (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and a reduction in greenhouse gases. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the state between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally, and internationally. The Strategic Plan includes four strategies:

1. All new residential construction in California will be zero net energy by 2020.
2. All new commercial construction in California will be zero net energy by 2030.
3. Heating, ventilation, and air condition (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted SB 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every 2 years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the *Final 2019 Integrated Energy Policy Report* (2019 IEPR) on February 20, 2020. The 2019 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California and covers a broad range of topics, including implementation of SB 100 (statewide greenhouse gas reduction targets), integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities,



demand response, transmission, landscape-scale planning, electricity and natural gas demand forecast, transportation energy demand forecast, renewable gas, updates on Southern California's electricity reliability, natural gas outlook, and climate adaptation and resiliency.

Renewables Portfolio Standard (RPS) Program

California's Renewables Portfolio Standard (RPS) program was established in 2002 by SB 1078 with the initial requirement that 20% of electricity retail sales must be served by renewable resources by 2017. The program was accelerated in 2015 with SB 350, which mandated a 50% RPS by 2030. SB 350 includes interim annual RPS targets with 3-year compliance periods and requires 65% of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which again increases the RPS to 60% by 2030 and requires all the state's electricity to come from carbon-free resources by 2045. The CPUC implements and administers RPS compliance rules for California's retail sellers of electricity, which include large and small investor-owned utilities, electric service providers, and community choice aggregators. The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources and adopting regulations for the enforcement of RPS procurement requirements of public owned utilities.

City of Monrovia Energy Action Plan

The City adopted the City of Monrovia Energy Action Plan (EAP) in June 2008. The EAP was prepared by the San Gabriel Valley Energy Wise Partnership (SGVEWP), which is composed of 30 San Gabriel Valley Cities, the Southern California Association of Governments (SCAG), and Southern California Edison (SCE). The EAP consists of 21 action items identified as the Monrovia Environmental Accords. The Monrovia Environmental Accords are focused on developing City policies that support sustainability in the fields of energy, waste, urban design, urban nature, transportation, environmental health, and water.

General Plan

Applicable goals and policies related to energy from the General Plan Land Use Element are listed below:

Land Use Element:

- Goal 10* *Ensure that new development is sensitive to the City's natural and open space resources and constraints.*
- Policy 10.6* *Encourage the conservation of water and energy resources in order to reduce the need for expansion of water reservoirs and distribution facilities.*
- Policy 10.9* *Require water efficient landscaping in regard to plant selection and irrigation.*



- 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-Related Energy Consumption

Project construction would consume energy in two general forms: fuel energy consumed by construction vehicles and equipment; and bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction of the project would involve on-site energy demand and consumption related to the use of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. Project construction would not involve the use of natural gas appliances or equipment. Project construction methods would be typical of current construction practices and would not require the use of more energy intensive machinery or higher than normal volumes of trucks and worker vehicle trips.

Construction of the project would occur over a 16-month duration, and would include site preparation, grading, building construction, paving, and architectural coatings. All construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation administered by CARB. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. As another benefit of these restrictions, off-road diesel-powered vehicles would consume less fuel and combust fuel more efficiently.

The project would also be subject to the California Environmental Protection Agency's strict on-road emissions standards for heavy-duty engines. These regulations contain strict air emissions standards that result in efficient engine fuel consumption rates compared to previous standards. In addition, technological innovations and more stringent standards are being researched, such as multifunction equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction in California over the next few years. As such, temporary energy use during construction of the project would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies. Thus, project construction activities would not result in a wasteful, inefficient, or unnecessary consumption of energy resources.

Further, substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials.



It is reasonable to assume that production of building materials would employ all reasonable energy conservation practices in the interest of reducing costs.

Operational Energy Consumption

The project site would be serviced by SCE for electricity and the Southern California Gas Company (SoCal Gas) for natural gas. Energy use associated with project operations would be typical of a single-family residence. Existing utilities include an overhead electrical line on the north side of Norumbega Drive and an existing natural gas line in Norumbega Drive. Natural gas and electricity access has not been defined to date. SCE and SoCal Gas would need to approve the location and engineering details of electrical and gas extensions, respectively, to supply the project. As required by the adopted 2019 Green Building Code, a solar system is required for the residence.³⁰

The project does not include any unusual project characteristics or require special equipment that would be more energy intensive than typical residential uses. The project would be required to include ENERGY STAR-rated appliances, energy-efficient HVAC systems, water-efficient landscaping, and irrigation systems in compliance with the most current Title 24 energy efficiency standards.

Maintenance activities during operations, such as landscape maintenance, would involve the use of electric- or gas-powered equipment. In addition to on-site energy use, the project would result in the consumption of oil-based fuels associated with vehicle trips generated by the residence. With regard to transportation fuel use, the project would not have control over fuel consumption factors such as vehicle type(s), engine efficiency, vehicle miles traveled, etc., for residents accessing the project site. However, due to CARB's increasing vehicle efficiency standards, it is assumed the long-term transportation fuel consumption from project operations would steadily decline over time and ensure that vehicle fuel consumption is not wasteful or inefficient.

The project would be subject to all relevant provisions of the most recent current standards of Title 24 and CALGreen Code. Compliance with these standards would ensure that the building energy use associated with the project would not be wasteful, inefficient, or unnecessary. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The EAP is focused on developing sustainable City policies and does not contain action items directly applicable to the project. Therefore, the applicable State plans and policies for renewable energy and energy efficiency include the 2019 Title 24 standards, the 2019 CALGreen Code, CPUC's Strategic Plan, and CEC's 2019 IEPR.

The project would be required to comply with 2019 Title 24 and CALGreen standards pertaining to building energy efficiency. Compliance with 2019 Title 24 standards and 2019 CALGreen Code would ensure the project incorporates energy-efficient windows, insulation,

³⁰ California Building Standards Commission. 2019. 2019 California Green Building Standards Code. Cal Green. California Code of Regulations Title 24, Part 11. Available at: <https://codes.iccsafe.org/content/CAGBSC2019/cover>. Accessed July 15, 2021.



lighting, and ventilation systems, which are consistent with the Strategic Plan strategies, the IEPR building energy efficiency recommendations, and General Plan Policies 10.6 and 10.9, as well as water-efficient fixtures, water-efficient landscaping, and electric vehicles charging infrastructure. Additionally, the project would use electricity provided by SCE. Per the RPS, SCE is composed of 33% renewable energy as of 2020 and would achieve at least 60% renewable energy by 2030. Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.



4.7 Geology and Soils

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

The information presented in this analysis is based on and supplemented with the *Report of Geotechnical Engineering Investigation* (Geotechnical Analysis) prepared by Cal Land Engineering, Inc., dba Quartech Consultants, dated May 22, 2020. This report is included as Appendix F.



- a. **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. Southern California, including the project area, is subject to the effects of seismic activity due to active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone.

The project site is located within an Alquist-Priolo Earthquake Fault Zone.³¹ The closest known faults are the Raymond Fault, and the Sierra Madre Fault Zone, which are 80 feet and 290 feet from the project site, respectively. Although no active faults cross the site, two active faults exist in the immediate vicinity, therefore the possibility of damage due to ground rupture is considered low to moderate.

The project would be required to demonstrate compliance with applicable seismic-related design requirements, including the California Building Code (CBC), Minimum Design Loads and Associated Criteria for Buildings and Other Structures Standard ASCE 7-16, and other applicable local codes (including Municipal Code Chapter 15.28, *Grading and Erosion Control*). These existing regulations would enforce the site-specific design recommendations identified in the Geotechnical Analysis in order to minimize the potential for damage and major injury during a seismic event. Specifically, pursuant to Municipal Code Section 15.28.070(A)(9), recommendations included in the Geotechnical Analysis must be incorporated into the project as a condition to the issuance of a building permit. These regulations include standards related to soils and foundations, structural design, building materials, and structural testing and inspections. Adherence to these building requirements and site-specific recommendations from the Geotechnical Analysis would minimize risks related to seismic ground shaking (SC GS-1). The project, therefore, would not expose people or structures to potential adverse effects of ground rupture or strong seismic ground shaking. Therefore, this impact would be less than significant.

Standard Conditions:

SC GS-1 Prior to issuance of a grading permit or encroachment permit, the respective Project Sponsor shall provide a geotechnical report that addresses earthwork and foundation recommendations, including but not limited to, earthwork, retaining walls and foundation construction adjacent to the existing structures located on the property, pavement structural sections and recommendations. The geotechnical report shall include data regarding the nature, distribution and strengths of existing soils, conclusions and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading.

³¹ California Geological Survey (CGS). 2014. Azusa Quadrangle. Earthquake Fault Zones. Seismic Hazard Zones. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>. Accessed August 20, 2021.



The report shall also include subsurface geology of the site, degree of seismic hazard if any, conclusions and recommendations regarding the effect of geologic conditions on the proposed development, opinions and recommended design criteria to mitigate any identified geologic hazards including locations of surface and subsurface fault lines in the area as applicable.

Mitigation Measures: No mitigation measures are required.

ii. *Strong seismic ground shaking?*

Less Than Significant Impact. Southern California has numerous active seismic faults subjecting residents to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for residents and structures, categorized either as primary or secondary hazards. Primary hazards include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Primary hazards can also induce secondary hazards such as ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

According to the Geotechnical Analysis, the Raymond and Sierra Madre faults are the closest known active faults and are located approximately 80 and 290 feet from the site, respectively. These faults would likely generate the most severe seismic ground shaking at the site. The peak ground acceleration at the project site for a 10% probability of exceedance in 50 years is about 0.607g, which correlates to an intensity of VIII on the modified Mercalli Scale and would produce severe ground shaking and moderate to heavy structural damage. The site, therefore, may be subject to strong ground shaking during seismic activity.

As discussed in Section 4.7(a)(i), the project would be required to demonstrate compliance with applicable seismic-related design requirements. Adherence to these building requirements and site-specific recommendations from the Geotechnical Analysis would minimize risks related to seismic ground shaking (see SC GS-1, above). The project, therefore, would not expose people or structures to potential adverse effects of strong seismic ground shaking. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Primary seismic shaking can induce ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, seismically induced water waves (tsunamis and seiches), movement on nearby independent faults (sympathetic fault movement), and dam failure. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater; 2) low-density non-cohesive (granular) soils; and 3) high-intensity ground motion. Saturated, loose to medium dense, near-surface cohesionless soils exhibit the highest liquefaction potential, whereas dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, cohesive soils are not considered susceptible to liquefaction. Effects of liquefaction on level ground include settlement, sand



boils, and bearing capacity failures below structures. Dynamic settlement of dry loose sands can occur as the sand particles tend to settle and densify as a result of a seismic event.

According to the Geotechnical Analysis, the project site lies within a designated Liquefaction Hazard Zone. The project site is underlain by fill and colluvium. The colluvium consists of generally dry to moist, loose to medium dense, slightly porous silty sand with rock fragments. Groundwater was not encountered during the geotechnical investigation and is not expected to be an issue for construction.

The Geotechnical Analysis recommends the existing fill be excavated and removed as it is not suitable to support fills and structures. The underlying colluvium should be removed to competent ground and then be used as backfill by replacing in thin lifts and compacting to 90% relative compaction. The Geotechnical Analysis further recommends that the residence be supported on the following foundation design:

- At the rear cut portion of the building pad, the building should be supported on conventional continuous footings which are embedded a minimum of 18 inches into competent bedrock. An allowable bearing value of 3,000 pounds per square foot may be used for design of continuous footings with a minimum of 12 inches in width. This value may be increased by one third when considering short-duration seismic or wind loads.
- Where the building is underlain by fill and/or colluvium, caissons should be used in combination with conventional footings. Caissons should be a minimum of 5 feet into the competent rock and at least 24 inches in diameter. All caissons should be at least 24 inches in diameter to facilitate cleanout. Caissons may be designed for an allowable end bearing pressure of 4,000 pounds per square foot. The excavations of the caisson should be cleaned of all loose and/or disturbed soils. Caissons may be assumed fixed at 2 feet into rock.

Use of the engineered backfill foundation design recommended in the Geotechnical Analysis would reduce impacts related to the potential for soil liquefaction. As discussed in Section 4.7)a)(i), adherence to seismic-related design and building requirements and site-specific recommendations from the Geotechnical Analysis would minimize risks related to seismic ground shaking, including liquefaction (SC GS-1). Specifically, pursuant to Municipal Code Section 15.28.070(A)(9), recommendations included in the Geotechnical Analysis must be incorporated into the project as a condition to the issuance of a building permit. The project, therefore, would not expose people or structures to potential adverse effects of seismic-related ground failure, including liquefaction. This impact would be less than significant impact.

Standard Conditions: Refer to SC GS-1.

Mitigation Measures: No mitigation measures are required.

iv. *Landslides?*

Less Than Significant Impact with Mitigation Incorporated. Parts of the project site, specifically the hillside above the location of the one-single family residence, are in a



Landslide Zone and an Alquist-Priolo Zone. According to the Geotechnical Analysis, the existing slope ranges from 1.5 to 1 (horizontal to vertical) and 2 to 2 (horizontal to vertical). The slope reaches an estimated height of 95 feet.

The Geotechnical Analysis concluded that the proposed construction and grading for the residence would be safe against geotechnical hazards such as landslides, settlement, or slippage if appropriate maintenance of the retaining walls is implemented after construction.

The Geotechnical Analysis concluded that the proposed work would not adversely affect the geologic stability of the property provided that grading and construction are performed in compliance with the local codes and recommendations presented in Section 10.0 of the Geotechnical Analysis (as enforced through SC GS-1).

In conclusion, implementation of SC GS-1 and Mitigation Measure GS-1 would reduce the potential of landslide and slope instability impacts to less than significant.

Standard Conditions: Refer to SC GS-1.

Mitigation Measures:

GS-1 To appropriately address the potential for landslide and slope instability, the following measures shall be implemented during and after construction of the project. The contractor shall be responsible for ensuring construction measures are implemented. Post-construction measures shall be the responsibility of the property owner:

- a. Protect slopes from runoff by installing and maintaining top-of-slope compacted earth berms or concrete interceptor drains.
- b. Install backdrains for all retaining walls.
- c. Install and maintain landscaping on all slopes; landscaping on slopes shall be with suitable plant material requiring minimum cultivation and irrigation water to thrive.
- d. Install and use an irrigation system to provide for regulated and controlled watering of vegetation (i.e., avoiding over- or under-watering). After construction of the residence is complete, avoid overwatering and slope saturation.
- e. Maintenance shall include correction of defective drainage terraces on slope, elimination of burrowing rodents, corrections of defective irrigation facilities, and controlled slope vegetation growth. Irrigation programs for all landscaped slopes should be well controlled and minimized. Seasonal adjustments should be made to prevent excess moisture in the slope soils.

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

Less Than Significant Impact. The primary concern in regard to soil erosion or loss of topsoil would be from construction activities associated with the project (e.g., earthwork and grading).



Construction activities associated with the project would expose on-site soils to short-term erosion by wind and water; however, as the project would disturb more than 1 acre of soil, the project would require preparation of a Stormwater Pollution Prevention Plan (SWPPP) for approval by the City Engineer prior to construction, pursuant to the National Pollution Discharge Elimination System (NPDES) program; refer to Section 4.10, Hydrology and Water Quality. The SWPPP would identify BMPs to be implemented with the project to prevent erosion, minimize siltation impacts, and protect water quality. Adherence to the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. During project operation, the project would be required to maintain irrigated landscaping on the hillside as discussed in Section 4.7(a)(iv), above. Thus, soil erosion or loss of topsoil are unlikely to occur during project operation. Following compliance with the applicable regulations, including implementation of BMPs associated with NPDES requirements, the project would result in less than significant impacts involving soil erosion and loss of topsoil.

Mitigation Measures: No mitigation measures are required.

- 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 with Mitigation Incorporated. Refer to Responses 4.7(a)(iii), 4.7(a)(iv), and 4.7(d) for a discussion concerning liquefaction, landslides, and expansive soils, respectively.

Lateral Spreading

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along sloping ground. The project site's potential for lateral spreading is considered moderate to high based on its location in a mapped Liquefaction Zone; refer to Response 4.7(a)(iii). The Geotechnical Analysis recommends the existing fill be excavated and removed as it is not suitable to support fills and structures. The underlying colluvium should be removed to competent ground then used as backfill by replacing in thin lifts and compacting to 90% relative compaction. Adherence to these requirements and site-specific recommendations from the Geotechnical Analysis would minimize risks related to lateral spreading (see SC GS-1, above). Therefore, less than significant impacts would occur.

Landslide

Refer to Section 4.10(a)(iv) for a discussion of landslide potential on the site. The northern portion of the project site is located in a mapped Landslide Zone.³² The Geotechnical Analysis concluded that the proposed work would not adversely affect the geologic stability of the property provided that grading and construction are performed in compliance with the local codes and recommendations presented in Section 10.0 of the Geotechnical Analysis (as enforced through SC GS-1) and that appropriate installation and maintenance of the slopes

³² California Geological Survey (CGS). 2014. *Azusa Quadrangle. Earthquake Fault Zones. Seismic Hazard Zones.* Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>. Accessed August 20, 2021.



and retaining walls occurs (as required in Mitigation Measure GS-1). Therefore, this impact would be less than significant impact with mitigation incorporated.

Soil Shrinkage and Subsidence

Refer to Section 4/7(a)(iii) regarding liquefaction potential.

According to the Geotechnical Analysis, the colluvium soils have low potential for settlement if compacted as suggested and differential settlement is not expected to be significant. The project would be required to demonstrate compliance with applicable CBC and design requirements as well as the site-specific design recommendations identified in Section 10.0 of the Geotechnical Analysis to reduce impacts related to unstable soil conditions (as enforced through SC GS-1). Compliance with applicable design requirements and recommendations would reduce impacts to less than significant.

Standard Conditions: Refer to SC GS-1.

Mitigation Measures: Refer to Mitigation Measure GS-1.

d. Be located on expansive soils, 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. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements.

According to the Geotechnical Analysis, the project site has a very low expansion potential. Nonetheless, the project would be subject to compliance with applicable CBC and Standard ASCE 7-16 requirements as well as site-specific design recommendations identified in the Geotechnical Analysis (as enforced through SC GS-1). Compliance with applicable design requirements would reduce impacts in regard to expansive soil, if any, and this impact would be less than significant.

Standard Conditions: Refer to SC GS-1.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.



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

Less Than Significant Impact. According to the Geotechnical Analysis, the project site partially contains artificial fill at the surface to depths of 6 feet below ground surface, and Quaternary colluvium at the surface to depths of 6 to 10 feet below ground surface. Both units are subsequently underlain by Mesozoic plutonic igneous rocks. Artificial fill consists of grayish brown, silty sand with rock fragments. Artificial fill is unlikely to contain significant fossils due to its age and level of disturbance. Colluvium consists of brown to reddish brown, silty sand with rock fragments. Colluvium typically is deposited via mass wasting along slopes in areas of high topographic relief, which is a setting not conducive for fossil preservation. Therefore, both artificial fill and colluvium have a low paleontological potential based on the classifications of the Society of Vertebrate Paleontology (SVP).³³ The underlying bedrock consists of weathered plutonic igneous rocks, such as dark gray quartz diorite, formed from the cooling of molten rock under high heat and/or high pressure deep below the surface of the crust. Plutonic igneous rocks have no paleontological potential.³⁴

Ground disturbances associated with the project may require removal of artificial fill and colluvium to approximately 10 to 11 feet below ground surface across most of the site, with some local excavations extending into the underlying quartz diorite bedrock. Because artificial fill and colluvium have a low paleontological potential, and the underlying quartz diorite has no paleontological potential, paleontological resources are not anticipated to be impacted during project grading activities. Nevertheless, in the event that paleontological resources are discovered in the colluvium during project earthwork or excavation, Standard Condition SG-2 would require all project construction activities to halt until a qualified paleontologist identifies the paleontological significance of the find and recommends a course of action. Thus, following implementation of SC GS-2, this impact would be less than significant.

Standard Conditions:

SC GS-2 If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease within 50 feet of the discovery and the construction contractor shall contact the City Planning Division. With direction from the City Planning Division, a qualified paleontologist, who meets the guidelines defined by the Society of Vertebrate Paleontology, shall be retained to evaluate the find and recommend a course of action. If warranted, the qualified paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for identified resources. Construction shall not resume within 50 feet of the discovery until the qualified paleontologist states in writing that the proposed construction activities would not significantly damage paleontological resources.

Mitigation Measures: No mitigation measures are required.

³³ Society of Vertebrate Paleontology (SVP). 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf.

³⁴ Society of Vertebrate Paleontology (SVP). 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf.



4.8 Greenhouse Gas Emissions

<i>Would the Project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

The information presented in this analysis is based on and has been supplemented with the 2021 *Air Quality & Greenhouse Gas Technical Report* prepared by SWCA Environmental Consultants (SWCA) and included here as Appendix C.

Global Climate Change

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone, and certain hydro-fluorocarbons. These gases, known as greenhouse gases (GHGs), allow solar radiation (sunlight) into the Earth’s atmosphere, but prevent radiative heat from escaping, thus warming the Earth’s atmosphere. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the Earth’s temperature. Emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the greenhouse effect and contribute to what is termed “global warming,” the trend of the warming of the Earth’s climate from anthropogenic activities.

California is a substantial contributor of global GHGs, emitting over 400 million tons of CO₂ per year.³⁵ Climate studies indicate that California is likely to see an increase of 3 to 4 degrees Fahrenheit over the next century. CH₄ is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the Earth’s ability to absorb heat in the atmosphere. Because primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is disassociated with the point of emission.

Regulations and Significance Criteria

The Intergovernmental Panel on Climate Change (IPCC) developed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that

³⁵ California Air Resources Board (CARB). 2020. *California Greenhouse Gas Emission Inventory for 2000 to 2018*. Available at: https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf. Accessed July 20, 2021.



a stabilization of GHGs at 400 to 450 parts per million (ppm) CO₂ equivalent (CO₂e)³⁶ concentration is required to keep global mean warming below 2 degrees Celsius, which in turn is assumed to be necessary to avoid significant levels of climate change. As of May 2020, the highest monthly average concentration of CO₂ in the atmosphere was recorded at 417 ppm.³⁷

Executive Order S-3-05 was issued in June 2005, establishing the following GHG emission reduction targets:

- 2010: Reduce GHG emissions to 2000 levels;
- 2020: Reduce GHG emissions to 1990 levels; and
- 2050: Reduce GHG emissions to 80% below 1990 levels.

Assembly Bill (AB) 32 requires that CARB identify statewide GHG emissions level in 1990 and establish a statewide GHG emissions limit that would ensure statewide emissions are reduced to 1990 levels by 2020. As such, CARB established a 2020 emissions limit of 427 million metric tons of CO₂e (MMTCO₂e).

Executive Order B-30-15, issued in April 2015, requires statewide GHG emissions to be reduced 40% below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in Executive Order B-30-15. The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB must also adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

Due to the nature of global climate change, it is not anticipated that any single development project would have a substantial effect on global climate change. GHG emissions from the project would combine with emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change.

The General Plan provides smart growth and land use planning principles designed to reduce vehicle miles traveled (VMT) and result in a reduction in GHG emissions and addresses climate change and GHG reduction policies in multiple elements. The City also has prepared the City of Monrovia EAP, which seeks to decrease energy use and dependence and requires consistency with energy saving strategies. This includes Title 24 of the Energy Action Plan, which requires energy efficient strategies.

South Coast Air Quality Management District Thresholds

At this time, there is no absolute consensus in the State of California among CEQA lead agencies regarding the analysis of global climate change and the selection of significance criteria. In fact, numerous organizations, both public and private, have released advisories and guidance with recommendations designed to assist decision makers in the evaluation of GHG emissions given the current uncertainty regarding when emissions reach the point of significance. Lead agencies

³⁶ Carbon dioxide equivalent (CO₂e) is a metric measure used to compare the emissions from various GHGs based on their global warming potential.

³⁷ Scripps Institution of Oceanography. 2020. *Rise of Carbon Dioxide Unabated*. Available at: <https://scripps.ucsd.edu/news/rise-carbon-dioxide-unabated>. Accessed December 15, 2020.



may elect to rely on thresholds of significance recommended or adopted by State or regional agencies with expertise in the field of global climate change.

The SCAQMD has formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting No. 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, the project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. For all non-industrial projects, the SCAQMD is proposing a screening threshold of 3,000 metric tons of CO₂e (MTCO₂e) per year. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Therefore, for the purposes of this project, the Tier 3 threshold is considered the applicable threshold.

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

Less Than Significant Impact. Project-related GHG emissions would include emissions from direct and indirect sources. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. The project site is currently undeveloped.

Construction Emissions

Construction emissions are typically summed and amortized over the lifetime of a project (assumed to be 30 years), then added to the operational emissions.³⁸ As shown in Table 4-8, Operational Net Greenhouse Gas Emissions, the project would result in 8.3 MTCO₂e per year (amortized over 30 years).

Total Project-Related Sources of Greenhouse Gases

As shown in Table 4-8, the total amount of project-related GHG emissions from direct and indirect sources combined would be approximately 23.8 MTCO₂e per year. Therefore, project GHG emissions would not exceed the SCAQMD Tier 3 threshold. Therefore, this impact would be less than significant.

³⁸ The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District. Source: South Coast Air Quality Management District, 2009. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*. August 26. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2). Accessed July 20, 2021.



Mitigation Measures: No mitigation measures are required.

**Table 4-8
Operational Net Greenhouse Gas Emissions**

Emissions Source	GHG Emissions (metric tons CO ₂ e/year)
Construction equipment and vehicle emissions	248.72
Operations emissions	15.52
Construction emissions – amortized ¹	8.3
Operational Emissions – facility site ²	15.52
Total	23.8
Significance Threshold ³	3,000
Threshold exceeded?	No

Notes:

1. Total construction emissions amortized over project life of 30 years.
2. Includes direct and indirect emissions of project site operations.
3. The SCAQMD interim threshold for GHG emissions, 3,000 MT/year for commercial projects, is used. Calculations, assumptions, and model outputs are provided in Appendix C.

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

Less than Significant. The project is a single-family residence and would not significantly contribute to cumulative increases in GHG emissions over time nor conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. At the time of this analysis, the City has not adopted a GHG reduction plan against which the project can be evaluated.

2017 Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a Scoping Plan as required by AB 32.³⁹ The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan Update (the most recent update) identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve Statewide GHG emissions targets.

³⁹ The *Climate Change Proposed Scoping Plan* was approved by the CARB on December 11, 2008.



Table 4-9, Project Consistency with the 2017 Scoping Plan, summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project would not conflict with any of the provisions of the 2017 Scoping Plan and in fact supports four of the action categories through energy efficiency, water conservation, recycling, and landscaping.

**Table 4-9
Project Consistency with 2017 Scoping Plan**

Sector / Source	Category / Description	Project Consistency Analysis
Energy		
California Renewables Portfolio Standard (SB 350 and SB 100)	Increases the proportion of electricity from renewable sources to 33% renewable power by 2020. SB 350 requires 50% by 2030. SB 100 requires 44% by 2024, 52% by 2027, and 60% by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	No Conflict. The project would attain energy from SCE, which is required to meet the 2030, 2045, and 2050 performance standards. In 2018, approximately 35% of SCE's electricity came from renewable resources. ¹ By 2030, SCE plans to achieve 80% carbon-free energy. ² The project would also meet the applicable requirements of the Title 24 Standards and the California Green Building Standards Code (CALGreen).
CCR, Title 24, Building Standards Code	Energy Efficiency Standards for Residential and Nonresidential Buildings.	Mandatory Compliance. The project must demonstrate that it will meet the applicable requirements of the 2019 Title 24 Standards and CALGreen prior to approval of the building permits.
Lighting Efficiency and Toxics Reduction Act (AB 1109)	The Lighting Efficiency and Toxics Reduction Act (AB 1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average Statewide electrical energy consumption by not less than 50% from the 2007 levels for indoor residential lighting and not less than 25% from the 2007 levels for indoor commercial and outdoor lighting by 2018.	No Conflict. According to the CEC, energy savings from AB 1109 are achieved through codes and standards. Energy savings from AB 1109 are calculated as part of codes and standards savings. ³ As discussed above, the project would meet the applicable requirements of the 2019 Title 24 Standards and CALGreen, which include energy efficient lighting.
California Green Building Standards (CALGreen) Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	Mandatory Compliance. The project construction plans must demonstrate that energy efficiency appliances (including bathroom exhaust fans) and equipment would meet the applicable energy standards in the 2019 Title 24 Standards and CALGreen prior to approval of the building permits.



Sector / Source	Category / Description	Project Consistency Analysis
	HVAC Systems will be designed to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	Mandatory Compliance. The project construction plans must demonstrate that energy efficiency appliances and equipment would meet the applicable energy standards in ASHRAE 90.1-2013 Appendix G and the 2019 Title 24 Standards and CALGreen prior to approval of the building permits.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	Not Applicable. The project includes a 5,106-square-foot residence. Therefore, the project would not include any buildings exceeding 10,000 square feet and energy commissioning would not be required.
	Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 8 or higher.	Mandatory Compliance. The project must demonstrate compliance with the requirement of MERV 13 or higher, in accordance with the 2019 CALGreen Code, prior to approval of the building permits.
	Refrigerants used in newly installed HVAC systems shall not contain any chlorofluorocarbons (CFC)s.	Mandatory Compliance. The project must meet this requirement as part of its compliance with the 2019 CALGreen Code prior to approval of the building permits.
	Parking spaces shall be designed for carpool or alternative fuel vehicles. Up to 8% of total parking spaces will be designed for such vehicles.	Not Applicable. The project is a residence.
	Long-term and short-term bike parking shall be provided for up to 5% of vehicle trips.	Not Applicable. The project is a residence.
	Requires use of low-VOC coatings consistent with AQMD Rule 1168.	Consistent. The project would be consistent with this regulation and would meet the low-VOC coating requirements.



Sector / Source	Category / Description	Project Consistency Analysis
SB 1368, CCR Title 20, Cap-and-Trade Program	The Cap-and-Trade Program places an economy-wide “cap” on major sources of greenhouse gas emissions (i.e., refineries, power plants, industrial facilities and transportation fuels) and minimizes the compliance costs of achieving AB 32 goals. Electricity generators and large industrial facilities emitting 25,000 MTCO ₂ e or more annually are subject to the Cap-and-Trade Program. Each year the cap is lowered by approximately 3%, ensuring that California is reducing greenhouse gases.	Not Applicable. This program involves capping emissions from large-scale electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect residential projects.
Mobile Sources		
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31% of 1990 gasoline consumption (and associated GHG emissions) by 2020.	Not Applicable. These regulations apply to automobile manufacturers, not individual land uses. Mobile emissions associated with the project in Table 4-8 reflect compliance with this regulation.
Low Carbon Fuel Standard (Executive Order S-01-07)	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels. This executive order establishes a Statewide goal to reduce the carbon intensity of California’s transportation fuels by at least 10% by 2020	Not Applicable. The Low Carbon Fuel Standard applies to manufacturers of automotive fuels, not to individual land uses. Mobile emissions associated with the project in Table 4-8 reflect compliance with this regulation.
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.	Not Applicable. The project is a single-family residence.



Sector / Source	Category / Description	Project Consistency Analysis
SB 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	Consistent. The project is a single-family residence.
Water		
CCR, Title 24, Building Standards Code	Title 24 includes water efficiency requirements for new residential and non-residential uses.	Mandatory Compliance. The project would be required to comply with Chapter 4, Division 4.3 – Water Efficiency and Conservation of the 2019 Title 24 Standards. This includes compliance with the Model Water Efficient Landscape Ordinance (MWELO).
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and AB 341	The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50% of their solid waste from disposal facilities. AB 341 directs the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75% disposal reduction by the year 2020.	Not Applicable. These regulations apply to municipal agencies which are responsible for reducing landfill disposal of solid wastes collected in their jurisdictions.

Notes:

1. California Energy Commission (CEC). 2020. *2019 Power Content Label Southern California Edison*. Available at: https://www.sce.com/sites/default/files/inline-files/SCE_2019PowerContentLabel.pdf. Accessed August 22, 2021.
2. California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*, Figure 4: California 2013 Anthropogenic Black Carbon Emission Sources. November.
3. California Energy Commission (CEC). 2013. *2013 California Energy Efficiency Potential and Goals Study, Appendix Volume I*.

Source: California Air Resources Board (CARB). *California's 2017 Climate Change Scoping Plan*. November.

Conclusion

In summary, the plan consistency analysis demonstrates that the project complies with or exceeds the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2017 Scoping Plan. Therefore, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the project is consistent and does not conflict with these plans, policies, and regulations, the project's incremental increase in GHG emissions would not result in a



significant impact on the environment. Therefore, impacts with regard to climate change would be less than significant.

Mitigation Measures: No mitigation measures are required.



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4.9 Hazards and Hazardous Materials

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

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the project would involve the transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban infill project.



As described in Section 2, Project Description, construction activities would be temporary, lasting approximately 16 months. These temporary construction activities involving the use, transport, storage, and disposal of hazardous materials would be conducted in compliance with all health and safety requirements, such as County and City General Plan policies, CCR Sections 337 through 340, Chapter 6.95 of the California Health and Safety Code Article 1, and CCR Title 19, Public Safety, Division 2 (if required). Because the Project Sponsor would comply with applicable regulations and laws pertaining to the transport, storage, use, and disposal of potentially hazardous materials, the exposure of the public, construction workers, and environment to hazardous materials would be less than significant.

Operation of the single-family residence would involve the use and storage of small quantities of potentially hazardous materials, such as cleaning solvents, paints, and pesticides for landscaping. Other household hazardous materials could include cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with residential land uses. The project generally would not produce significant amounts of hazardous waste or use or transport hazardous waste beyond those materials typically used in single-family households. Overall, the use of household hazardous materials would be similar to the existing use of surrounding residences. Thus, the operation of the project would not create a significant hazard to the environment or public, and the impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project could create an upset or accident condition involving hazardous materials. No hazardous contamination sites are located in the vicinity of the project site and thus there is no reasonably foreseeable release of hazardous materials from existing hazardous contamination.^{40,41} Construction of the project would use small amounts of hazardous materials such as diesel fuel. The BMPs implemented for the SWPPP would contain any minor spills during construction. During operation, the use of household hazardous materials would be minimal, in small quantities, and would be associated with routine maintenance, cleaning, and landscaping activities. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and the impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁴⁰ State Water Resources Control Board (California Water Boards). 2018. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/map/>. Accessed February 3, 2021.

⁴¹ Department of Toxics Substances Control (DTSC). 2018. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/map>. Accessed February 3, 2021.



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

No Impact. There are no schools within 0.25 mile of the project site. The nearest existing school is Tzu Chi Elementary School, 420 Wildrose Avenue, approximately 0.93 mile southwest of the project site. The project would not handle hazardous materials within 0.25 mile of an existing or proposed school. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and to submit such information to the Secretary for Environmental Protection on at least an annual basis. In meeting the provisions in California Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources such as EnviroStor and GeoTracker provide information regarding identified facilities. According to EnviroStor and GeoTracker, the project site is not located in the vicinity of a hazardous materials site;^{42,43} therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

e. For a project located within an airport land use plan or, where such 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 project is not located within an airport land use plan and there are no public or private airports or airstrips within 2 miles of the project site. The nearest airport to the project site is the San Gabriel Valley Airport, located approximately 6 miles to the southwest at 4233 Santa Anita Avenue, El Monte. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency

⁴² State Water Resources Control Board (California Water Boards). 2018. GeoTracker Website. Available at: <https://geotracker.waterboards.ca.gov/map/>. Accessed August 24, 2021.

⁴³ Department of Toxics Substances Control (DTSC). 2018. EnviroStor Website. Available at: <https://www.envirostor.dtsc.ca.gov/public/map>. Accessed August 24, 2021.



response plan or emergency evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

The City has adopted an Emergency Operations Plan which establishes and details emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements.⁴⁴ Once approved by the City Council, this plan is an extension of the County of Los Angeles Emergency Response Plan and the California Emergency Plan. In addition, Monrovia Fire and Rescue Department (MFD) has adopted a Community Wildfire Protection Plan (CWPP) which identifies potential evacuation routes and procedures.⁴⁵ According to the CWPP, MFD's plan for evacuation of hillside residents due to wildfire involves coordination among many departments and agencies, and emergency evacuation routes are dependent on the location and movement of the wildfire. The CWPP identifies likely evacuation routes and routes where no parking would be allowed. Potential evacuation routes identified in the CWPP include Norumbega Drive, Greystone Avenue, Mountain Avenue, and South Myrtle Avenue. Routes with no parking include portions of Norumbega Drive.⁴⁶ In 2020, the Bobcat Fire burned 116,000 acres including parts of Angeles National Forest, Monrovia Hillside Wilderness, and portions of Monrovia Canyon Park, and burned to within 750 feet of the project site. During the Bobcat Fire, the project site was, for a time, under evacuation warning. Identified evacuation routes during that time included North Shamrock Avenue, North Ivy Avenue, and East Foothill Boulevard.⁴⁷

Construction of one single-family residence under the project would result in minimal amounts of traffic related to worker trips, the delivery of materials, and disposal of excavated soils. The house would be constructed on Norumbega Drive, which is 30 feet wide at the project site. Construction traffic would not impede public access and would not interfere with the City's CWPP or the MFD. Mitigation Measure HAZ-1 requires that, in the event of wildfire evacuation warning, construction would cease, and all impediments would be removed from the street. Traffic generated by the one single-family residence would be negligible and would not adversely affect the level of service of nearby roadways or intersections. During the construction phase, the City would require an encroachment permit for any temporary activities that would affect the public right-of-way. In addition, under Mitigation Measure TRA-1 in Section 4.17, Transportation, the project would be required to prepare a Traffic Management Plan for approval by the City Traffic Engineer. The Traffic Management Plan would include procedures for emergency responses. Therefore, with the implementation of Mitigation Measures HAZ-1 and TRA-1, project construction would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan, and impacts would be reduced to less than significant.

The project would incorporate all applicable design and safety standards and regulations as set forth by the CBC and MFD to ensure that it does not interfere with the provision of local

⁴⁴ City of Monrovia. 2021a. Draft Emergency Operations Plan. Part 2: EOC Management and Implementation Plan. Accessed September 14, 2021.

⁴⁵ City of Monrovia Fire and Rescue. 2014. *Community Wildfire Protection Plan*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/1836/636244055698530000>. Accessed September 15, 2021.

⁴⁶ City of Monrovia Fire and Rescue. 2014. *City of Monrovia Wildfire Protection Plan*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/1836/636244055698530000>. Accessed September 15, 2021.

⁴⁷ City of Monrovia. 2020b. Bobcat Fire. Prepare for Evacuations webpage. Available at: <https://www.cityofmonrovia.org/your-government/bobcat-fire/prepare-for-evacuations>. Accessed August 30, 2021.



emergency services (i.e., provision of adequate access roads to accommodate emergency response vehicles, minimum turning radii, etc.). Thus, project implementation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

Mitigation Measures: Refer to Mitigation Measure TRA-1.

HAZ-1 During construction, only allow parking of vehicles on one side of Norumbega Drive to ensure emergency vehicles can access the surrounding neighborhood should a wildfire occur in the area. If Norumbega Drive is identified as an evacuation route during a wildfire emergency, the contractor would be responsible for ensuring that all vehicles and materials are immediately removed from the street and the evacuation route is clear.

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

Less Than Significant Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. According to the City's Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, Monrovia has been listed by CalFire as a "Community at Risk from Wildfire."⁴⁸ The extensive wildland interface with the Angeles National Forest land at its northern border makes the city susceptible to the effects of any fire that originates in the northern reaches. The greatest fire danger to Monrovia is from the Wildland-Urban Interface (WUI), where homes are in close proximity to the 30- to 50-year brush growth.⁴⁹

The project site is in the foothills of the San Gabriel Mountains and is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area (LRA).⁵⁰ In addition, according to CalFire's Fire and Resource Assessment Program (FRAP), the project is located in a WUI. The WUI area is defined as: having dense housing (from 1 house per 20 acres to more than 1 house per acre), being adjacent to vegetation that can burn in a wildfire (moderate, high, or very high fire hazard severity zone), and being not dominated by wildland vegetation.⁵¹

However, the project site is located within a substantially developed area with existing infrastructure, including fire hydrants. It is approximately 1.5 miles from Fire Station 101 and the project must be reviewed and approved by the MFD. Further, the project would be required to comply with MFD requirements prior to building occupancy. MFD requirements include, but would not be limited to:

⁴⁸ City of Monrovia. 2021b. *Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/26307/637624796825430000>. Accessed September 14, 2021.

⁴⁹ City of Monrovia. 2021b. *Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/26307/637624796825430000>. Accessed August 25, 2021.

⁵⁰ California Department of Forestry and Fire Protection (CAL FIRE). 2007. Fire Hazard Severity Zone Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2021.

⁵¹ California Department of Forestry and Fire Protection (CAL FIRE). 2019. Fire and Resource Assessment Program (FRAP). Wildland-Urban Interface Map. Available at: https://frap.fire.ca.gov/media/10300/wui_19_ada.pdf. Accessed August 24, 2021.



- Installing an automatic fire sprinkler system, including in garages and basements per California Residential Code 313 and Monrovia Municipal Code amendments
- Installing a Monrovia Fire and Rescue-approved fire access driveway in accordance with the Municipal Code Chapter 15.20
- Providing and mark fire-protection equipment in accordance with Section 4908.6
- Providing address markers in accordance with Section 4908.7
- Ensuring exterior walls shall have a fire-resistive rating of not less than 1 hour as described in Section 3602.1 of the Monrovia Municipal Code
- Complying with California Residential Code 337 requirements
- Creating a fuel break of 200 feet of defensible space around the perimeter of all structures. Plants in this area would be limited to low growing, nonwoody, properly watered and maintained plants such as ornamental vegetative fuel or cultivated ground cover, such as green grass, ivy, succulents, or similar plants used as ground cover. Trees are allowable provided that the distances between crowns and crowns from adjacent trees, structures, or unmodified fuel is not less than 15 feet
- A vegetation management plan would be required in compliance with California Firesafe Council 4906 and the Monrovia Municipal Code shall be provided with architectural submittal.

Although the project could expose people or structures to a risk of wildland fire, it is in an established residential neighborhood and would comply with all MFD requirements to reduce risks. In addition, the project would not significantly increase ignition risks or fuel load within the project area. For these reasons, the project would not create a significant increase in exposure of people or structures to a significant risk or loss, injury, or death involving wildland fires. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.



4.10 Hydrology and Water Quality

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

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

Less Than Significant Impact.

Short-Term Construction

Applicable Water Quality Standards and Waste Discharge Requirements

As part of Section 402 of the Federal Clean Water Act, the EPA has established regulations under the NPDES program to control direct stormwater discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates



industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is located in the Los Angeles River Watershed within the jurisdiction of the Los Angeles RWQCB.

Project construction is subject to the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (General Construction Permit).⁵² The project is also required to comply with the City of Monrovia Storm Water Management and Discharge Control Ordinance (Municipal Code Chapter 12.36, Storm Water and Urban Runoff Pollution Control), which requires development projects to comply with the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4 (Order No. R4-2012-0175)⁵³ (Municipal NPDES Permit).

Short-Term Construction Impacts

Sources of short-term construction-related water pollution associated with the project include the following:

- Handling, storage, and disposal of construction materials containing pollutants;
- Maintenance and operation of construction equipment; and
- Earthmoving activities.

These sources, if not controlled, can generate soil erosion, cause on- and off-site transport via storm runoff or mechanical equipment, and produce contaminants like fuel, oil, antifreeze, or other vehicle-related fluids. Earthmoving activities (i.e., grading and excavation required for project implementation) would result in exposed soils that may be subject to wind and water erosion.

As the proposed disturbed area (1.295 acres) would be more than 1 acre in size, the General Construction Permit would require the Project Sponsor to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify BMPs to be used during construction of the project to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality.

As outlined in Municipal Code Section 12.36.090, Requirements for Industrial/Commercial and Construction Activities, dischargers associated with construction activities would be required to implement effective BMPs, including source control BMPs in accordance with Table 10 of Part VI.D.6.f of the Municipal NPDES Permit. Additionally, the project would be required to comply with provisions within Chapter 15.28, Grading and Erosion Control, of the

⁵² State Water Resources Control Board (California Water Boards). 2009. *General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ*. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.html. Accessed August 24, 2021.

⁵³ Regional Water Quality Control Board (RWQCB). 2018. *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except those Discharges Originating from the City of Long Beach*. California Regional Water Quality Control Board Los Angeles Region. Available at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2015/wqo2015_0075.pdf MS4. Accessed August 24, 2021.



Municipal Code, which includes measures to substantially reduce the potential for erosion and sedimentation damage within the city.

Implementation of the SWPPP and compliance with all applicable permit and Municipal Code requirements, as required by law, would prevent construction of the single-family residence from violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface water or groundwater quality, and would reduce potentially significant impacts to a less-than-significant level.

Long-Term Operations

The project is required to comply with the Municipal NPDES Permit and Municipal Code—specifically, Municipal Code Section 12.36.100, Planning and Land Development Program Requirements For New Development And Redevelopment – Low Impact Development, which includes provisions for integrating low impact development (LID) practices and standards for stormwater pollution mitigation through means of infiltration, evapotranspiration, biofiltration, and rainfall harvest and use. LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. The County of Los Angeles Department of Public Works Low Impact Development (LID) Standards Manual provides guidance for complying with the requirements of the Municipal NPDES Permit.⁵⁴

The single-family residence would include the construction of approximately 3,900 square feet of impervious surface area, including the driveway, stair, and patio. As described in Section 2.2, Project Characteristics, the project would drain to Norumbega Drive, and eventually to Sawpit Wash. Monrovia Municipal Code Section 12.36.100 identifies single-family hillside residential developments as subject to City conditions and approval for the design and implementation of post-construction controls and other BMPs to mitigate stormwater pollution. Under this code, new hillside single-family homes must implement the following measures to control stormwater:

- a. Conserve natural areas;
- b. Protect slopes and channels;
- c. Provide storm drainage stenciling and signage;
- d. Divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability; and
- e. Direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability.

Under Part VI.D.7.c of the Municipal NPDES Permit, new development must implement BMPs to retain runoff from a 0.75-inch, 24-hour rain event or an 85 percentile 24-hour rain event, whichever is larger. However, single-family hillside homes are exempt from the new development/redevelopment project performance criteria of Part VI.D.7.c of the Municipal

⁵⁴ Los Angeles County Department of Public Works. 2014. *Low Impact Development (LID) Standards Manual*. Available at: <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>. Accessed August 24, 2021.



NPDES Permit unless they create, add, or replace 10,000 square feet or more of impervious surface area.

Construction plans included with the building permit submittal would include design details and supporting calculations for stormwater diversion to vegetated areas prior to discharge. Vegetated areas would flow to Norumbega Drive. The plans shall include pad elevation, finished floor elevation, site high and low points, drainage swales, area drains, and existing grade at adjacent properties.

Erosion and sedimentation may temporarily increase post-construction because of soils that have been loosened and changes in drainage patterns. Development of the single-family residence could result in an increase in the levels of urban pollutants and litter entering Sawpit Wash. Pollutants from the project would likely be consistent with suburban low-density residential areas. However, the property would be landscaped to stabilize soils, and areas to receive natural vegetation shall be seeded prior to October 15; therefore, the addition of one single-family residence in an established residential neighborhood would not result in a violation of any water quality standards or waste discharge requirements, and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. A potentially significant impact would occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement, the withdrawal of groundwater, or paving of existing permeable surfaces important to groundwater recharge. The project would be served by the City.

The project is located within the San Gabriel Valley Groundwater Basin. According to the California DWR, the San Gabriel Valley Groundwater Basin is designated as a very low priority basin.⁵⁵ The Sawpit Spreading Grounds, northwest of the project site, are used for groundwater recharge by the Los Angeles County Department of Public Works but would not impact the project area. The project would create approximately 3,900 feet of impervious surface area on a hillside lot. As discussed under Section 4.10(a), construction plans included with the building permit submittal would include design details and supporting calculations for stormwater diversion to vegetated areas prior to discharge, therefore, the required stormwater detention system would allow for some groundwater recharge. Therefore, the project would not interfere with groundwater recharge in a very low priority groundwater basin and this impact would be less than significant.

The project would be supplied with water through the City's municipal system, which draws upon groundwater sources. The City has determined that sufficient municipal supplies are available from these sources to serve the project and that the project would not deplete municipal supplies. In addition, direct pumping of groundwater from below the site would not be allowed. In summary, the project would not affect groundwater basins below the site nor

⁵⁵ California Department of Water Resources (DWR). 2019. *SGMA Basin Prioritization Dashboard*. Available at: <https://gis.water.ca.gov/app/bp-dashboard/p2/>. Accessed August 24, 2021.



deplete groundwater in and around the project site. Further, the proposed project would not substantially deplete the City's groundwater supplies. No impact would occur.

Mitigation Measures: No mitigation measures are required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact.

Short-Term Construction Impacts

Planned earthwork and grading activities on the project site would involve a total of approximately 576 cubic yards of cut and 266 cubic yards of fill. Soil disturbance would temporarily occur during project construction due to earthmoving activities such as excavation, soil compaction and moving, and grading. Disturbed soils can be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff if construction conditions are not properly controlled. Thus, project construction could result in erosion or siltation on- or -off-site.

Refer to Response 4.10(a). As outlined in Municipal Code Section 12.36.090, commercial discharger and dischargers associated with construction activities would be required to implement a SWPPP with effective BMPs, including source control BMPs, in accordance with Table 10 of Part VI.D.6.f of the Municipal NPDES Permit. Additionally, the project would be required to comply with provisions within Municipal Code Chapter 15.28, which includes measures to substantially reduce the potential for erosion and sedimentation. Compliance with all applicable permit and Municipal Code requirements results in less than significant construction impacts related to erosion and sedimentation.

Long-Term Operational Impacts

As discussed under Response 4.10(a), the project would create approximately 3,900 square feet of new impervious surface area. Under Monrovia Municipal Code Section 12.36.100, the project would be required to design and implement post-construction controls and other BMPs to mitigate stormwater pollution, including diverting stormwater to vegetated areas for filtration prior to discharge. Therefore, the project would not substantially alter the existing drainage pattern of the site during operational activities such that substantial erosion or siltation would occur, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. As detailed in Response 4.10(c)(i), the project would increase the impervious surface area by approximately 3,900 square feet which would



increase stormwater runoff from the site. Stormwater would flow down Norumbega Drive to Sawpit Wash and enter the wash through existing storm drains. There is no flooding history in Sawpit Wash. The project would be designed to comply with Municipal Code Section 12.36.100 and divert runoff to vegetated areas prior to discharge, which would reduce runoff rates from storms. Therefore, the project is not anticipated to result in flooding on- or off-site, and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

- 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. As detailed in Response 4.10(c)(i), stormwater runoff under post-development conditions would be slightly increased over existing conditions. The project is not expected to exceed the capacity of the existing/planned stormwater drainage systems. Additionally, the project would not result in a substantial change in topography that would alter or change flow patterns in the project area. As discussed in Response 4.10(a), less than significant impacts related to potential polluted runoff from the site would occur with compliance with the Municipal Code provisions and implementation of the BMPs as outlined in the SWPPP. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

- iv. *Impede or redirect flood flows?*

Less Than Significant Impact. According to the Federal Emergency Management Agency's National Flood Hazard Viewer, the project site is not located in an identified flood hazard zone and there are no identified flood hazard zones downstream in Sawpit Wash.⁵⁶ According to the City's Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire (July 2021), the City has adequate flood control to protect it from flooding.⁵⁷

As detailed in Responses 4.10(c)(i), 4.10(c)(ii), and 4.10(c)(iii), the project would not substantially increase the rate or amount of surface runoff on-site in manner that would result in on- or off-site flooding or exceed the capacity of existing or planned stormwater drainage systems. This impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁵⁶ Federal Emergency Management Agency (FEMA). 2008. *FEMA's National Flood Hazard Layer (NFHL) Viewer*. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>. Accessed August 25, 2021.

⁵⁷ City of Monrovia. 2021b. *Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/26307/637624796825430000>. Accessed August 25, 2021.



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

Less Than Significant Impact.

Flood Hazard

As discussed in Response 4.10(c), the project site is not located in a flood hazard area. Based on the California DWR Division of Safety of Dams Dam Breach Inundation Map, the project site is located on the edge of the flood inundation area for both the main Sawpit Dam and the Sawpit Debris Basin Dam. The Dam Breach Inundation Map shows the inundation extent for a sunny day dam failure for both dams. The edge of the inundation area for the Sawpit Dam is approximately 100 feet from the project site. The edge of the inundation area for the Sawpit Debris Basin Dam is approximately 200 feet west of the project site.⁵⁸

The Sawpit Dam (No. 32-12, CA00196) has a capacity of 406 acre-feet and is located north of downtown Monrovia. The condition of the Sawpit Dam is rated Satisfactory,⁵⁹ therefore it does not have a recognized potential for failure due to the seismic activity. Its downstream hazard is rated Extremely High. The Extremely High hazard rating is defined as: “Expected to cause considerable loss of human life or would result in an inundation area with a population of 1,000 or more”.⁶⁰

The Sawpit Debris Basin Dam (No 32-13; CA01157) has a capacity of 152 acre-feet and is located north of downtown Monrovia. The condition of the Sawpit Dam is rated Fair,⁶¹ therefore it has the potential for failure due to rare or extreme seismic or hydrologic events. Its downstream hazard is rated Extremely High. For both dams, most of the flooding would occur in Sawpit Canyon between North Canyon Boulevard and the I-215.

A rupture of either dam (i.e., in the event of an earthquake, seiche, or catastrophic failure during a rain event) could result in inundation of the project site and surrounding area. These reservoirs, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure all dams are capable of withstanding the maximum considered earthquake for the site. Therefore, the potential for dam failure is considered low. Also, the County of Los Angeles Office of Emergency Management has developed emergency response plans, including evacuation plans, for dam inundation areas. Therefore, impacts on safety as a result of a dam failure are also considered low and this impact would be less than significant.

⁵⁸ California Department of Water Resources (DWR). 2021. California Dam Breach Inundation Map. California DWR Division of Safety of Dams. Available at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed August 25, 2021.

⁵⁹ Satisfactory: No existing or potential dam safety deficiencies are recognized. Acceptable performance is expected under all loading conditions (static, hydrologic, seismic) in accordance with the applicable regulatory criteria or tolerable risk guidelines.

⁶⁰ California Department of Water Resources (DWR). 2020. *Definitions of Downstream Hazard and Condition Assessment*. California DWR Division of Safety of Dams. Available at: <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-Safety-of-Dams/Files/Publications/Definitions-of-Downstream-Hazard-and-Condition-Assessment.pdf>. Accessed August 25, 2021.

⁶¹ Fair: No existing dam safety deficiencies are recognized for normal loading conditions. Rare or extreme hydrologic and/or seismic events may result in a dam safety deficiency. Risk may be in the range to take further action.



Tsunami

A tsunami, or tidal wave, is a large sea wave produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over 27 miles inland from the Pacific Ocean and is not in a tsunami inundation zone. No impact would occur.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project area is not adjacent to the water bodies behind the Sawpit Dam, or Sawpit Debris Basin Dam, therefore there would be no risk of direct impacts from a seiche on these water bodies. The project area is approximately 430 feet southeast of the Sawpit Spreading Basin, which is a shallow basin used for groundwater recharge. This basin is uphill from the project site and can hold up to 13 acre-feet (equal to 4,236,000 gallons) of water, but the basin is too shallow to be a seiche hazard for the project site. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact.

Applicable Water Quality Control Plan

As discussed under Response 4.10(a), the project site is located within the jurisdiction of the Los Angeles RWQCB. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) establishes water quality standards for ground and surface waters within the Los Angeles region, which includes the city of Monrovia, and is the basis for the Los Angeles RWQCB's regulatory programs.

Chapter 8, Groundwater Quality Management, of the Basin Plan focuses on basin/sub-basin groundwater quality management and includes Salt and Nutrient Management Plans (SNMPs) specific to each basin within the Los Angeles region. Specifically, Section F of the Basin Plan includes the program of implementation based on the Basin's SNMP, which includes existing and planned programs to manage salts and nutrients in the Basin (SNMP management measures). The SNMP management measures (refer to Tables 8.6-4A and Table 8.6-4B of the Basin Plan) developed by local water entities in the San Gabriel Valley Groundwater Basin are voluntary measures that are designed to maintain water quality that is protective of beneficial uses, while increasing recycled water use and supporting the sustainable use of groundwater. These measures are applied in conjunction with existing water quality protection measures in each groundwater basin area.

Applicable Sustainable Groundwater Management Plan

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans or prepare an alternative to a groundwater



sustainability plan. The project site is located within the San Gabriel Valley Groundwater Basin, which is designated as a Very Low priority basin.⁶² Therefore, there is no groundwater sustainability plan established for the basin.

Project Impacts

As indicated in Response 4.10(b), the project would not substantially deplete groundwater supplies or interfere with groundwater recharge. The project is not anticipated to conflict with or obstruct with the groundwater basin and SNMP management measures identified in the Basin Plan. For these reasons, the project is not anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁶² California Department of Water Resources (DWR). 2020. *SGMA Basin Prioritization Dashboard*. Available at: <https://gis.water.ca.gov/app/bp-dashboard/p2/>. Accessed December 13, 2020.



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4.11 Land Use and Planning

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	

a. Physically divide an established community?

No Impact. The project site is in an established hillside residential neighborhood; refer to Figure 2-2, Site Vicinity. Surrounding uses consist of residential uses to the south, east, and west, and open space to the north. The project proposes to construct one single-family residence. The adjacent lots on either side (524 Norumbega Road and 547 Norumbega Drive) are developed with single-family residences. Development of the project would not physically divide an established community as it would not introduce any physical divisions or barriers between the site and surrounding area. Therefore, the project would not physically divide an established community and no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The project proposes to construct one single-family residence. The site is currently designated Public/Quasi-Public and zoned P/QP (Public/Quasi-Public) as identified in the General Plan Land Use Element (refer to Figure 1, General Plan Land Use Map, of the General Plan Land Use Element).⁶³

The project proposes to amend the General Plan Land Use Map from Public/Quasi-Public to Residential Foothill. There are no proposed revisions to General Plan text. The project also proposes to amend the City's Zoning Map to change the zoning designation from P/QP (Public/Quasi-Public) to RF (Residential Foothill). Approval of a General Plan Land Use Map amendment and Zoning Map amendment from P/QP to RF would be required to construct the single-family residence on the project site.

As detailed in Table 4-10, Table 4-11, and Table 4-12, below, the project would be consistent with all General Plan Policies and relevant portions of the Municipal Code for Residential Foothill development with one exception. The project would require a Minor Exception to allow one retaining wall with fencing on top to be constructed in excess of the maximum height;

⁶³ City of Monrovia. 2020c. *City of Monrovia General Plan. Land Use Element*. Available at: <https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/land-use-element>. Accessed September 15, 2021.



refer to Table 4-11, Project Consistency with Residential Foothill (RF) Zone. The Project Sponsor is requesting a Minor Exception to allow the retaining wall with fencing on top on the west side of the property to be 10 feet in height, in excess of the 6-foot maximum height required under Municipal Code Section 17.12.040

**Table 4-10
Project Consistency with Applicable
General Plan Land Use and Housing Elements Policies**

Applicable General Plan Policies	Project Consistency Analysis
LAND USE ELEMENT	
GOAL 3: Preserve the integrity of residential neighborhoods.	
<u>Policy 1.3.</u> Ensure adequate on-site parking for all residential developments.	<u>Consistent.</u> The project proposes one single-family residence with a four-car garage. This exceeds the required two-car garage in the zoning ordinance.
GOAL 4: Promote land use patterns and development which contribute to community and neighborhood identity.	
<u>Policy 4.1.</u> Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the project.	<u>Consistent.</u> Refer to Table 4-1, General Plan Policies Governing Scenic Quality.
<u>Policy 4.2.</u> Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the project.	<u>Consistent.</u> Refer to Table 4-1, General Plan Policies Governing Scenic Quality. Refer to Section 4.13, Noise, and Section 4.17, Transportation, for discussions on potential impacts on construction-related and operational noise, ground-borne vibration, circulation system, and emergency access in project vicinity. As concluded in Section 4.1, Aesthetics, the project would be required to undergo advisory review from the Development Review Committee as well as a Neighborhood Compatibility Design Review and obtain design review approval from the City, which would ensure that the project design is compatible with existing development in terms of architectural style, development patterns, and scale.
GOAL 5: Encourage new development that is compatible with and complements existing land uses.	
<u>Policy 5.1.</u> Consider the impacts of new development on infrastructure.	<u>Consistent.</u> As concluded in Section 4.19, Utilities and Service Systems, the project would result in less than significant impacts on existing utilities infrastructure.
GOAL 9: Preserve the character of existing neighborhoods and historic residences.	
<u>Policy 9.3.</u> Continue to monitor development standards in single-family and multifamily residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.	<u>Consistent.</u> As concluded in Section 4.1, Aesthetics, the project would be required to undergo advisory review from the Development Review Committee as well as a Neighborhood Compatibility Design Review and obtain design review approval from the City, which would ensure that the project design is compatible with existing development.



Applicable General Plan Policies	Project Consistency Analysis
GOAL 10: Ensure that new development is sensitive to the City's natural and open space resources and constraints.	
<u>Policy 10.1.</u> Adhere to the Hillside Development Policies and Standards designed to regulate development in the foothills so as to maximize preservation of open space and ridgelines and minimize disruption of plant and animal life.	<u>Consistent.</u> The project would construct a single-family residence adjacent to Norumbega Drive on the lowest part of the site. As such, it would avoid ridgelines and maximize preservation of open space. The project would meet all requirements of the Hillside Development Policies and Standards.
<u>Policy 10.6.</u> Encourage the conservation of water and energy resources in order to reduce the need for expansion of water reservoirs and distribution facilities, as well as energy generating plants and distribution facilities.	<u>Consistent.</u> The project would be required to comply with the most recent version of the California Green Building Code and with the DWR Model Water Efficient Landscape Ordinance.
<u>Policy 10.9.</u> Require water efficient landscaping in regard to plant selection and irrigation.	<u>Consistent.</u> The project would be required to comply with the DWR Model Water Efficient Landscape Ordinance. Refer to Section 2.2, Project Description.
<u>Policy 10.13.</u> Continue to implement the Oak Tree Preservation Ordinance.	<u>Consistent.</u> The Project Sponsor has submitted an Arborist Report as required by the Oak Tree Ordinance and would adhere to the mitigations recommended in the report. Refer to Section 4.4, Biological Resources, for impacts to oak trees.
GOAL 11: The City of Monrovia shall provide its residents with a high quality urban environment through the development and conservation of resources such as land, water, minerals, wildlife, and vegetation.	
<u>Policy 11.7.</u> Comply with the National Pollutant Discharge Elimination System regarding stormwater management to reduce impacts from stormwater run-off.	<u>Consistent.</u> Refer to Section 4.10, Hydrology and Water Quality, for a discussion of potential project impacts on water quality and the project's consistency with the NPDES programs.
HOUSING ELEMENT	
GOAL 4: Preserve housing and neighborhood assets and promote environmental sustainability.	
<u>Policy 4.1</u> Preserve the character, scale and quality of established residential neighborhoods and ensure that new housing is well-designed and compatible with the neighborhood context in which it is located.	<u>Consistent.</u> The project would construct a single-family residence in a residential neighborhood and would be required to undergo advisory review from the Development Review Committee as well as a Neighborhood Compatibility Design Review and obtain design review approval from the City, which would ensure that the project design is compatible with the neighborhood context in which it is located.
<u>Policy 4.9</u> Encourage energy conservation, water efficiency, and sustainable building measures in new and existing homes through adherence to the California Green Building Code.	<u>Consistent.</u> The project would be required to comply with the most recent edition of the California Green Building Code.

Source: City of Monrovia, General Plan, updated February 2020.



**Table 4-11
Project Consistency with Residential Foothill (RF) Zone**

Development Standard	Code Requirement	Proposed Condition	Is Project Consistent With Requirement?
RF Zone Development Standards			
Lot Size	Minimum Lot Area: 15,000 square feet; Minimum Lot Width: 100 feet; and Minimum Lot Depth: 100 feet. Mean Average Area: >1 acre	The lot area is 1.295 acres or 56,410 square feet. The lot is irregularly shaped, with width ranging from 39 feet at street level to approximately 250 feet at its widest point and a depth of approximately 350 feet. Refer to Figure 2-3, Site Plan, and Appendix A, Design Plans.	Yes
Floor Area Lot Coverage	Minimum Floor Area: 1,250 square feet Maximum floor area: 35% of net area for first 20,000 square feet plus an additional 10% of remaining area Attached Garages: included in total floor area	The FAR calculation would allow a floor area of 10,641 square feet. The proposed floor area is 5,106 square feet including the garage.	Yes
Building Setbacks	Front: 25 feet Side: 1 st story: 5-foot minimum, 15-foot maximum 2 nd story: 15 feet Rear: 1 st story: 25% of lot depth, minimum 20 feet 2 nd story: 25% of lot depth plus 10 feet	The proposed residence would be constructed with first-floor setbacks as follows: 25-foot front setback, 6-foot side setbacks, and 291-foot rear setback. The second floor has 15-foot side setbacks.	Yes
Building Height	Lots less than 75 feet wide: 27 feet above finished grade	The proposed building height is 25 feet 6 inches above finished grade.	Yes
Retaining Walls	Maximum Height: Rear and side yards 6 feet Front yard 3 feet	The proposed retaining wall on the north side of the property would be 5 feet in height. The retaining wall on the east side would be 3 feet in height. Refer to the Geotechnical Analysis for discussion of need for extra height.	Yes



Development Standard	Code Requirement	Proposed Condition	Is Project Consistent With Requirement?
Miscellaneous Residential Standards – All Residential Zones			
Fences, Hedges, Walls	Maximum Height: Rear and side yards: 6 feet Front Yard: 4 feet Materials: masonry or wooden of adequate aesthetic quality;	The east side of the property is designed to have a masonry fence 3 feet high in the front yard and 6 feet high in the rear of the house, which would terminate at the northern retaining wall. The west side would have a wooden fence on top of a retaining wall where it is adjacent to other residential lots. Where the property is adjacent to open space, it would not be fenced. Refer to Figure 2-3, Site Plan, and Figure 2-4, Building Elevations.	No. Will require Minor Exception for exceeding height along a portion of the west property line
Irregularly shaped Lots	The committee shall have the power to determine the appropriate method of determining lot orientation, depth, and width.	The committee has approved the determination of lot orientation, depth, and width.	Yes

Source: City of Monrovia. 2021c. Municipal Code Sections 17.12.010 and 17.12.040

**Table 4-12
Project Consistency with Hillside Development Standards**

Hillside Development Standards	Project Consistency Analysis
1. Conservation of natural topographic features and appearances by means of land sculpturing to blend graded slopes and benches with natural topography.	<u>Consistent.</u> The project confines grading to the area directly around the dwelling. The majority of the project site retains natural topography. Refer to Figure 2-5, Grading Plan.
2. Protection of existing vegetation through careful site planning which may reduce areas of grading.	<u>Consistent.</u> The project confines grading to the area directly around the dwelling. The majority of the project site retains existing vegetation. Refer to Figure 2-5, Grading Plan.
3. Provision of safe access for vehicular and pedestrian traffic with minimum of disturbances of the natural terrain. Utilization of street designs and improvements which serve to minimize grading impact and harmonize with the natural contours and character of the hillsides. Street standards shall be per the city's adopted Hillside Development Policies and Standards	<u>Consistent.</u> The project does not include new streets. The driveway and garage for the new residence are located adjacent to Norumbega Drive and provide safe access. Refer to Figure 2-3, Site Plan.
4. Every reasonable effort shall be made to preserve or minimize the impact on view corridors and scenic vistas. visual impact analysis shall be required per the city's adopted Hillside Development Policies and Standards.	<u>Consistent.</u> The project locates the residence at the lowest portion of the site and avoids interruptions of scenic vistas. Refer to Section 4.1, Aesthetics, for a discussion of visual impacts.
5. Every reasonable effort shall be made to preserve mature trees, especially oaks. Special consideration shall be given to the preservation or relocation of heritage trees.	<u>Consistent.</u> The project submitted an Arborist Report and retains all existing oak trees. Refer to Section 4.4, Biological Resources, for a discussion of oak tree mitigations and protection.



Hillside Development Standards	Project Consistency Analysis
6. Cantilevered construction, overhang, exposed structures or stem wall construction shall not be permitted. Cantilevered decking shall be permitted only if the line of sight analysis indicates no visual impact or appropriate mitigation measures can be adopted.	<u>Consistent.</u> The project does not include cantilevered construction, overhangs, exposed structures, or stem wall construction. Refer to Figure 2-3, Site Plan, and Figure 2-4, Building Elevations.
7. Colors of the buildings shall be selected to blend with the natural colors and hues of the surrounding hillsides.	<u>Consistent.</u> The project would be required to undergo a Neighborhood Compatibility Design Review and receive approval of color choices.
8. A landscape plan shall be required indicating type and extent of proposed vegetation. In addition, landscape materials for the coverage and stabilization of graded slopes shall be approved by the Development Review Committee.	<u>Consistent.</u> The project protects existing oak trees and would submit a Landscape Plan for approval by the City and City of Monrovia Fire and Rescue. Refer to Section 4.4, Biological Resources, for a discussion of oak tree protection. Refer to Section 2.2, Project Description, for landscaping requirements.
9. A visual impact analysis shall be required for those dwelling units which are proposed to be developed in "sensitive" areas. "Sensitive" areas are those which are higher in elevation and visually exposed to the city-at-large and could potentially impact existing city-at-large viewsheds. Proposed dwelling units designated as "sensitive" shall be set back from the top of the slope a distance determined by the line-of-sight analysis in addition to the required setbacks. The line of sight analysis is not designed to completely screen or eliminate the view of the dwelling units in sensitive areas. However, it is designed to minimize the visual impact of building lines by the use of increased setback, berming, landscaping, and building design.	<u>Consistent.</u> The project is located on the lowest portion of the site and is not in a sensitive location. Refer to Section 4.1, Aesthetics, for a discussion of visual impacts.

Source: City of Monrovia. 2021c. Municipal Code Section 17.12.10.G

The following analysis evaluates the project’s consistency with the applicable land use plans, policies, and regulations, including the General Plan and Zoning Ordinance.

General Plan

According to the General Plan, the Public/Quasi-Public General Plan designation is intended for development of public uses such as schools, and government offices and facilities, as well as quasi-governmental offices and facilities such as those for the telephone company and other utilities. The Residential Foothill designation is intended for very low-density residential developments on land with relatively steep slopes or environmentally sensitive areas. The proposed development would construct one single-family residence on a 1.295-acre parcel; as such, the project would be an allowed use under the Residential Foothill designation.

General Plan Land Use Element Table 1, Land Use Designations, provides the maximum floor area ration (FAR) intensity requirements for the Residential Foothill designation. The Residential Foothill designation allows a maximum permitted FAR of 35% of the net lot area for the first 20,000 square feet, plus an additional 10% of the remaining net lot area. Under the Residential Foothill FAR calculation, the proposed residence would be permitted a floor



area of up to 10,641 square feet but is proposing a floor area of 5,106 square feet. Thus, the project would be consistent with the FAR requirements.

Table 4-10, Project Consistency with Applicable General Plan Land Use Element Policies, analyzes the project's consistency with applicable goals and policies in the General Plan Land Use and Open Space Elements. As analyzed in Table 4-10, the project would be consistent with all applicable General Plan policies.

Zoning Ordinance

The project site is currently zoned P/QP (Public/Quasi-Public). The Project Sponsor has requested a rezoning to the RF (Residential Foothill) designation. Municipal Code Section 17.12.010, Residential Foothill (RF) Development Standards, establishes development policies and standards for properties located within the Residential Foothill zone. Municipal Code Section 17.12.040, Miscellaneous Residential Standards/All Residential Zones Residential Foothill (RF) Development Standards, establishes supplemental development policies and standards for all residential properties.

Table 4-11, Project Consistency with Residential Foothill (RF) Zone, analyzes the project's consistency with development standards for residential uses in the RF zone. As demonstrated in Table 4-11, the project does not conflict with the City's Zoning Ordinance, with the exception of the requirement for the wall height. The Project Sponsor would require a Minor Exception be granted by the City.

In addition to the Residential Foothill (RF) Development Standards, the project must comply with the City's Hillside Development Standards. Municipal Code Section 17.12.010.G, Hillside Development Standards, establishes standards to protect hillside slopes, natural vegetation, and aesthetic appearance. Table 4-12, Project Consistency with Hillside Development Standards, analyzes the project's consistency with Hillside Development Standards. As demonstrated in Table 4-12, the project does not conflict with the City's Hillside Development Standards.

General Plan Amendment and Rezoning

The Project Sponsor is requesting a General Plan Land Use Map Amendment to change the land use designation of the property from Public/Quasi-Public to Residential Foothill. The Project Sponsor is also requesting a rezoning to change the zoning designation of the property from P/QP (Public/Quasi-Public) to RF (Residential Foothill).

Based on the information presented above, if the project land use and zoning are changed to Residential Foothill, the project would be consistent with the General Plan, as well as the City's Municipal Code, except for the development standard for the maximum height of walls. The Project Sponsor is pursuing a Minor Exception determination to allow a 10-foot high combination retaining wall/fence on the west side of the development. Therefore, the project would be consistent with the applicable land use plans and policies and zoning regulations, and project impacts on land use and planning.



Hillside Development Permit

A Hillside Development Permit is required for new single-family dwellings that result in grading with 5 feet or more of cut and fill. The project would include grading to approximately 11 feet and result in approximately 576 cubic yards of cut and 266 cubic yards of fill, and, therefore, would be required to obtain a Hillside Development Permit.

Conclusion

Overall, the project would be consistent with the General Plan and Zoning Ordinance upon approval of the requested discretionary actions: General Plan Amendment, Rezone, Minor Exception, and Hillside Development Permit, and subsequent project review. The project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.



4.12 Mineral Resources

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

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?

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if a project would convert an existing or future regionally important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally important mineral resource extraction. The southwestern portion of the project site is located in an area zoned Mineral Resource Zone (MRZ)-2 for aggregate mineral resources.⁶⁴ MRZ-2 is defined as areas containing mineral deposits where adequate information exists that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. However, the project site is also mapped in an urbanizing area of the greater Los Angeles area and is in a residential community within Monrovia city limits.^{65,66} Therefore, no impacts to mineral resources of statewide or regional significance would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Refer to Response 4.12(a). The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

Mitigation Measures: No mitigation measures are required.

⁶⁴ Los Angeles County. 2021. Los Angeles County Interactive GIS Map. Available at: https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed July 22, 2021.

⁶⁵ California Department of Conservation (CDOC). 1975. *Urbanized and Urbanizing Areas in the Greater Los Angeles Area as Identified by the Office of Planning and Research*. CDOC Division of Mines and Geology. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed July 22, 2021.

⁶⁶ City of Monrovia. 2019. City of Monrovia Zoning Map. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/1378/636960188069700000>. Accessed July 23, 2021.



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4.13 Noise

<i>Would the project result in:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b. Generation of excessive ground borne vibration or ground borne noise levels?				✓
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such 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?				✓

This section provides an overview of applicable noise regulations, and a quantitative assessment of existing noise levels and anticipated noise levels during project construction and operations. Moreover, this section provides a summary of any noise mitigation measures to be implemented to ensure compliance with the federal, state, and/or local noise standards or codes during construction and operation of the project.

General Information

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Sound is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (reduces) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at an approximate rate between 6.0 dBA and 7.5 dBA per doubling of distance.



There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light- and medium-density residential areas range from 55 dBA to 65 dBA.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

Regulatory Setting

U.S. Environmental Protection Agency

The EPA offers guidelines for community noise exposure in the *Noise Effects Handbook – A Desk Reference to Health and Welfare Effects of Noise*.⁶⁷ The guidelines consider occupational noise exposure as well as noise exposure in homes. The EPA recognizes an exterior noise level of 55 dBA L_{dn} as a general goal to protect the public from hearing loss, activity interference, sleep disturbance, and annoyance. The EPA and other federal agencies have adopted suggested land use compatibility guidelines that indicate that residential noise exposures of 55 dBA L_{dn} to 65 dBA L_{dn} are acceptable. However, the EPA notes that these levels are not regulatory goals, but are levels defined by a negotiated scientific consensus, without concern for economic and technological feasibility or the needs and desires of any particular community.

State of California

The California Governor's Office of Planning and Research (OPR) *General Plan Noise Element Guidelines* include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The *General Plan Noise Element Guidelines* contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the Community Noise Equivalent Level.⁶⁸

⁶⁷ U.S. Environmental Protection Agency (EPA). 1981. *Noise Effects Handbooks. A Desk Reference to Health and Welfare Effects of Noise*. Available at: <https://nepis.epa.gov/Exe/ZyNET.exe/91000AJ.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C81thru85%5CTxt%5C00000018%5C91000AJ.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>. Accessed August 2021.

⁶⁸ California Governor's Office of Planning and Research (OPR). 2017. *State of California General Plan Guidelines. Appendix D. Noise Element Guidelines*. Available at: <https://opr.ca.gov/planning/general-plan/guidelines.html>. Accessed August 2021.



CALGreen Code

The State of California requires that residential developments demonstrate compliance with the requirements of the California Green Building Standards Code (CALGreen). CALGreen’s mandatory measures, voluntary tiers, and other regulations, laws and construction codes relate to green building standards, which are applicable to residential construction in California. CALGreen does not have any specific noise level requirements associated with residential development. However, there are mandatory measures applicable to residential development that will affect potential noise from the project. CALGreen Section 4.507 is a mandatory measure to install ENERGY STAR fans with humidity controls in each bathroom. These qualified fans use provide better efficiency with less noise. No other CALGreen requirements are applicable to interior or exterior residential noise levels.

Municipal Code

The Municipal Code Chapter 9.44, Noise, provides noise guidelines and standards for the City. The City does not impose noise limits for temporary construction activities at surrounding noise-sensitive property lines. However, construction hours are established in Municipal Code Section 9.44.080, Exemptions. Municipal Code provisions applicable to the project are discussed below.

9.44.040, Allowable Noise.

(A) The noise standards imposed by this section shall apply to all properties in the city occupied for residential purposes, without regard to zoning classification. Except as otherwise allowed in this chapter, no person shall create or allow the creation of noise on any such residential property which causes the noise level to exceed the actual measured median ambient noise level, or the following presumed ambient noise level, whichever is greater:

Time	Allowable Noise Level—dBA
7:00 a.m. to 9:00 p.m.	55
9:00 p.m. to 7:00 a.m.	50

(B) If the intruding noise source is continuous and cannot be reasonably discontinued for sufficient time in which the ambient noise level can be determined, the presumed ambient noise level shall be used.

9.44.060, Permitted Noise Increase. Increases in noise levels prescribed in § 9.44.040 are permitted in accordance with the following:

Permitted Increase dBA	Duration of Increase Permitted (in minutes/per hour)
5	15
10	5
15	1
20	less than one minute



9.44.080, *Exemptions. The following activities shall be exempt from the provisions of this chapter:*

- (E) *The operation of any mechanically powered saw, sander, drill, grinder, lawn or garden tool or similar tool between 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 10:00 a.m. and 10:00 p.m. on weekends and holidays;*
- (F) *Construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays.*

9.44.090, *Radios, TVs, and Similar Devices.*

- (a) *The It shall be unlawful for any person within any residential zone of the city to use or operate any radio receiving set, musical instrument, stereo system, entertainment system, television set, or other machine or device for the producing or reproducing of sound or any device by which voice, music, or any other sound is generated, between the hours of 10:00 p.m. and 7:00 a.m. of the following day, in such a manner as to disturb the peace, quiet, and comfort of neighboring residents or any reasonable person of normal sensitiveness residing in the area.*
- (b) *Any noise exceeding the ambient noise level at the property line of any property, or, if a condominium or apartment house, within any adjoining unit by more than five decibels shall be deemed to be prima facie evidence, although not the exclusive evidence, of a violation of the provisions of this section.*

Existing Noise Environment

The primary noise source in the vicinity of the project site would be existing residential noise and roadway traffic. Near the project site, the southwest, south, and east sides of the parcel are developed with one- and two-story single-family residences. Open space, including a steep hillside, exists immediately north of the project site. Approximately 380 feet northwest of the project site are the Sawpit Spreading Grounds, which are used to divert water from the Sawpit Reservoir and Sawpit Debris Basin for groundwater recharge. Undeveloped hillsides leading up to the San Gabriel Mountains are north and east of the project site. The Angeles National Forest is 0.75 mile east and 0.92 mile northwest at its closest points. Municipal development, primarily residential, exists to the south and west. Sawpit Wash is approximately 350 feet southwest of the project site. The area around the project is mostly developed residential land.

Noise Measurements

A sound survey has not been conducted as the project site is currently undeveloped and not operational, and the project proposes a single-family residence in an established residential area.



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

Less Than Significant Impact.

Short-Term Construction Impacts

The City does not impose noise limits for temporary construction activities at surrounding noise-sensitive property lines. However, construction hours are established in Municipal Code Section 9.44.080 and the project would comply with these hours.

Short-term, temporary noise impacts associated with construction activities would primarily result from construction equipment and machinery. Noise levels would vary throughout construction depending on the phase of work, number and locations of operating equipment, distance of the noise receptor from the noise source, atmospheric conditions, and any intervening topography or barriers (e.g., walls, buildings, and vegetation).

Construction activities are generally temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction of the project would occur over a 16-month duration and would include site preparation, grading, building construction, paving and architectural coating. Ground-borne noise and other types of construction-related noise impacts typically occur during grading and building activities. These construction activities have the potential to generate the highest noise levels.

Equipment that may be operating during these phases would include, but is not limited to, a rubber-tired dozer, a grader, tractor/loader/backhoe, a crane, a haul truck for the exported soil, and a forklift. The most prevalent sound source during construction would be internal combustion engines used to power this construction equipment. Many construction machines operate intermittently and the types of machines in use at a construction site change with the construction phase. Operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents (lasting less than 1 minute) such as dropping large pieces of equipment or the hydraulic movement of machinery lifts.

As noted above, the project is a single-family residence located in a residential area and construction would be limited to daytime hours. For these reasons, it is not anticipated that construction-type noise at the project site would have significant impacts on the surrounding environment.

Construction noise levels were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The RCNM is FHWA's national model for the prediction of construction noise. This software is based on actual sound level measurements from various equipment types taken during the Central Artery/Tunnel project conducted in Boston, Massachusetts, during the early 1990s.⁶⁹ Estimates of noise from the construction of the project are based on a roster of the maximum amount of construction equipment used on a given day. Table 4-13, Noise Levels of Major Construction Equipment, shows a list of typical

⁶⁹ Federal Highway Administration (FHWA). 2011. Roadway Construction Noise Model (RCNM). Software Version 1.1.



construction equipment and the noise level at 50 feet. The RCNM has noise levels for various types of equipment preprogrammed into the software; therefore, the noise level associated with the equipment is typical for the equipment type and not based on any specific make or model.

The RCNM assumes that the maximum sound level for the project (L_{max}) is the maximum sound level for the loudest piece of equipment. The approximate noise generated by the construction equipment used at the facility has been conservatively calculated based on an estimated project construction equipment roster projected to be used at the project site at one time, and not considering further attenuation due to atmospheric interference or intervening structures.

The equipment and activities on-site would vary throughout the project, depending on various stages of construction. The predicted noise from construction activity is presented as a worst-case (highest noise level) scenario, where it is assumed all equipment is present and operating simultaneously on-site for each stage of construction. There is an existing residence located approximately 92 feet from the project boundary. Sound levels at this distance are estimated to be 76.7 dBA Leq.

Construction equipment likely to be used during construction is listed in Table 4-13. Construction equipment noise levels typically would be less than 85 dBA at 50 feet when equipment is operating at full load. People in the nearby surrounding environment may hear the construction noise, but the overall impact would be short-lived and less than significant.

Table 4-13
Noise Levels of Major Construction Equipment

Equipment Type	Sound Level at 50 Feet (dBA)
Crane	85
Paver	85
Dozers	85
Grader	85
Pickup Trucks	55
Loader	80
Tractor	84
Welder	73
Backhoes	80

Source: Federal Highway Administration (FHWA). 2011. Roadway Construction Noise Model (RCNM). Software Version 1.1.

Construction would not result in the generation of, or exposure of persons to, excessive noise levels for lengthy periods. Municipal Code 9.44.080 includes an exemption for construction conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays. The project construction would



occur only during these allowable construction hours. In addition, the project would adhere to the SC NS-1 through SC NS-4.⁷⁰

Long-Term Operational Impacts

The project is a single-family residence and the primary noise sources associated with the project would include the typical residential noise sources such as heating, ventilating, and air conditioning (HVAC) units. The project would result in minimal additional traffic on adjacent roadways since the project is a single-family residence, therefore vehicular noise in the project vicinity would not be significantly affected. The noise attributable to the project would follow the City’s limit of 55 dBA Ldn at the surrounding environment outside of the project area. Most listeners consider a 3.0-dB increase to be barely perceptible, a 5.0-dB increase to be noticeable, and a 10-dB increase to sound twice as loud. Table 4-14, Sound Level of Typical Noise Sources, presents noises common to the human ear, their average sound power (dBA), and the relative human judgement of loudness. Sounds come in an enormous variety of pitches, loudness, timbres, and rhythms. Based on different land uses, noises that are annoying in one area may be completely innocuous in other areas.

**Table 4-14
Sound Level of Typical Noise Sources**

Noise Source (at a given distance away from the observer)	Scale of A-Weighted Sound Level* (dBA)	Human Judgment of Noise Loudness (relative to a reference loudness of 70 dB*)
Military jet take-off with after-burner (50 feet) ¹	140	
Civil defense siren (100 feet)	130	
Commercial jet take-off (200 feet)	120	Considered the Threshold of Pain *32 times as loud
Pile driver (50 feet) Rock music concert environment	110	*16 times as loud
Ambulance siren (100 feet) Newspaper press (5 feet) Power lawn mower (3 feet)	100	Considered Very Loud *8 times as loud
Motorcycle (25 feet) Propeller plane flyover (1,000 feet) Diesel truck, 40 mph (50 feet)	90	*4 times as loud
Garbage disposal (3 feet) High urban environment	80	*2 times as loud
Passenger car, 65 mph (25 feet) Living room stereo (15 feet) Vacuum cleaner (3 feet)	70	Considered Moderately Loud

⁷⁰ City of Monrovia. 2020c. *City of Monrovia General Plan. Land Use Element*. Available at: <https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/land-use-element>. Accessed September 15, 2021.



Noise Source (at a given distance away from the observer)	Scale of A-Weighted Sound Level* (dBA)	Human Judgment of Noise Loudness (relative to a reference loudness of 70 dB*)
Normal conversation (5 feet) Air conditioning unit (100 feet) Department store environment	60	*1/2 as loud
Light traffic (100 feet) Private business office environment	50	*1/4 as loud
Commission Sound Limit	55	
Bird calls (distant) Lower limit of urban sound environment	40	Considered Quiet *1/8 as loud
Soft whisper (5 feet) Quiet bedroom environment	30	
Recording studio environment	20	Considered Perceptible to the human ear
	10	Considered the Lower Threshold of Hearing

Notes:

1. The noise environment from which the value is derived is the deck of an aircraft carrier.

* These values are logarithmic measurements (i.e., every 10-dBA increase is perceived by the human ear as approximately twice the previous noise level; therefore, the pile driver is twice as loud as the ambulance siren).

Source: Modified from Bureau of Land Management, Bureau of Indian Affairs, and Southern Ute Indian Tribe. 2002. *Oil and Gas Development on the Southern Ute Indian Reservation, Final Environmental Impact Statement*. July 2002.

Municipal Code Section 9.44.040 states that permanent project-generated noise levels should not exceed median ambient noise levels for daytime and nighttime hours. The project's operations would comply with the radio, television, and/or other sound-generating device noise restrictions in Municipal Code Section 9.44.090. The project-generated noise levels associated with the single-family residence would be in compliance with these City noise regulations. Thus, on-site operational noise impacts from the project would be less than significant.

Standard Conditions:

SC NS-1 All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

SC NS-2 Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

SC NS-3 All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.



- SC NS-4** A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and the equipment used. Operation of equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures. Construction activities (e.g., ground-disturbing activities, including grading and movement of heavy construction equipment) may generate localized ground-borne vibration and noise. Blasting or pile-driving activities are not anticipated in the construction of the project. Generally, construction-related ground-borne vibration is not expected to extend beyond 25 feet from the generating source. As a result, no vibration-related impacts to the surrounding environment would occur.

The project equipment is not expected to produce ground-borne vibration of a level to affect the equipment operation and, thus, no ground-borne vibration impacts would occur from the project equipment.

Mitigation Measures: No mitigation measures are required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such 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. No private airstrips are located in the site vicinity and the nearest public airport to the project site is the San Gabriel Valley Airport, located approximately 6 miles to the southwest. Therefore, the project would not expose people residing in the project area nor working on-site to excessive noise levels associated with aircraft. No impacts would occur.

Mitigation Measures: No mitigation measures are required.



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4.14 Population and Housing

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

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. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The project includes a zoning change to create a new residential hillside lot and construction of one single-family residence. In 2020, the population of the city of Monrovia was estimated to be 37,935 people. Given the average household size is 2.65 people, the project would result in a direct increase in population of up to approximately 3 people, or 0.008% of the estimated population.⁷¹

SCAG estimates that Monrovia’s projected population would be approximately 39,300 persons in 2035. The project’s anticipated contribution to estimated population growth—3 people—would be approximately 0.17% of SCAG’s projected population growth. For these reasons, the project’s anticipated population growth is well within SCAG’s population growth assumptions for the City. Thus, implementation of the project would not induce substantial unplanned population growth within the city, either directly or indirectly. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The project would rezone one vacant lot to Residential Foothill and construct one single-family residence. The project would not displace existing people or housing. No impact would occur.

Mitigation Measures: No mitigation measures are required.

⁷¹ City of Monrovia. 2021d. Demographics. Available at: <https://www.cityofmonrovia.org/your-government/community-development/planning/demographics>. Accessed August 25, 2021.



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4.15 Public Services

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

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

i. Fire protection?

Less Than Significant Impact. The Monrovia Fire and Rescue Department provides 24-hour fire, rescue, and emergency medical services to the City, including the project site. MFD also includes a Fire Prevention Division and Hazard Materials Division.⁷² The nearest station to the project site is Station 101, located at 141 East Lemon Avenue, approximately 1.25 miles southwest of the project site.

The project would result in the construction of one single-family residence. As discussed in Section 4.14, Population and Housing, although implementation of the project would increase the number of residents within the city, it is not anticipated to result in a substantial increase in population. Due to the limited population increase and the nature of development, a substantial increase in the need for fire facilities compared to the existing conditions is not anticipated. As a result, project implementation is not anticipated

⁷² City of Monrovia. 2021e. Divisions. Available at: <https://www.cityofmonrovia.org/your-government/fire-department/about-us/fire-stations>. Accessed August 25, 2021.



to require the construction of new or physically altered fire facilities and is not anticipated to result in an increase in service calls.

Nonetheless, the project would be subject to Municipal Code Chapter 15.20, Fire Code, which adopts by reference the 2019 Edition of the California Fire Code (Fire Code), which includes site access requirements and fire safety precautions (e.g., fire alarms, sprinkler systems, hydrants, and fire flow requirements). Because of this, the plans and construction would need to be reviewed and approved by MFD for the purpose of consistency with the Fire Code. MFD reviewed and approved the design plans with amendments (refer to Appendix B, Monrovia Fire and Rescue Department Plan Comments). Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Police protection?

Less Than Significant Impact. The City of Monrovia Police Department (MPD) provides law enforcement services to the City, including the project site. The nearest MPD station is located approximately 1.2 miles southwest of the project site at 140 East Lime Avenue. According to the General Plan, the police department is staffed with 64 regular police officers, 11 reserves, and 23 volunteer support personnel.

The project would construct one single-family residence. Implementation of the project is not anticipated to result in a substantial increase in population compared to existing conditions. Therefore, project implementation is not anticipated to require the construction of new or physically altered police facilities. This impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Schools?

Less Than Significant Impact. The City is served by the Monrovia Unified School District.⁷³ The project would construct one single-family residence, which potentially may add up to two children to the student population. The project would be subject to the requirements of AB 2926 and SB 50, which allow school districts to collect development impact fees to minimize potential impacts to school districts as a result of new development. Additionally, pursuant to Government Code Section 65996, the project's demands on school services would be fully offset through the collection of school fees imposed through the Education Code. As such, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Parks?

Less Than Significant Impact. The nearest City park to the project site is the Grand Avenue Park, located approximately 0.30 mile southwest of the project site at 340 North

⁷³ City of Monrovia. 2020d. Schools. Available at: <https://www.cityofmonrovia.org/city-services/schools>. Accessed October 30, 2020.



Grand Avenue.⁷⁴ In addition, Monrovia Canyon Park, at 1200 North Canyon Boulevard, is located approximately 0.75 mile north of the project site. The project would result in the construction of one single-family residence, which would not substantially increase the population in the project area. Thus, the project is not anticipated to indirectly result in a substantial increase in demand for park land. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

v. Other public facilities?

Less Than Significant Impact. Other public services that could potentially be impacted by the project are public libraries. The project site is served by the Monrovia Public Library, which is located approximately 1.2 miles southwest of the project site.⁷⁵ The project would construct one single-family residence and is not anticipated to result in a significant increase in the use of the Monrovia Library System. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁷⁴ City of Monrovia. 2020e. Visit Monrovia's Parks. Available at: <https://www.cityofmonrovia.org/your-government/parks>. Accessed October 30, 2020.

⁷⁵ City of Monrovia. 2020f. Library. Available at: <https://www.cityofmonrovia.org/your-government/library>. Accessed October 30, 2020.



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4.16 Recreation

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

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

Less Than Significant Impact. Refer to Response 4.15(a)(iv). The project would not result in a substantial increase in demand for parks or other recreational facilities and would not result in physical deterioration of these facilities. This impact would be less than significant impact.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Refer to Response 4.15(a)(iv). The project would construct one single-family residence. The project does not include recreational facilities and would not require the construction or expansion of recreational facilities. No impact would occur.

Mitigation Measures: No mitigation measures are required.



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4.17 Transportation

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

Regional and Local Access

The project site would be accessed by I-210 and East Foothill Boulevard, via South Mountain Avenue.

- **I-210 Freeway**: The I-210 freeway (within the jurisdiction of the California Department of Transportation [Caltrans]) is an interstate freeway located south of the project site. The I-210 freeway begins at its junction with Interstate 5, and travels southeast through the San Fernando Valley, Crescenta Valley, and San Gabriel Valley. The I-210 freeway is classified as an interstate freeway until it intersects with SR57 in Glendora. There, it is classified as a State Route in its eastbound direction where it continues.
- **Norumbega Drive**: Norumbega Drive is classified as a Local Street in the City of Monrovia Circulation Element (Circulation Element). Norumbega Drive is a sinuous mountain residential road that runs generally northwest-southeast in the vicinity of the project site. South of its junction with Oakcliff Road it turns and runs northeast-southwest to East Foothill Boulevard. It is constructed as a two-lane undivided roadway. It does not include a bicycle route or sidewalks in the vicinity of the project site.
- **East Foothill Boulevard**: East Foothill Boulevard is classified as a Collector Street within the city boundary and is a four-lane undivided roadway that runs east-west. It includes sidewalks but does not include a bicycle lane. It is a designated truck route between Mountain Avenue and the western border of the city.
- **South Myrtle Road**: South Myrtle Road is classified in the Circulation Element as a Primary Arterial between I-210 and Huntington Drive, and as a Collector Street between Huntington Drive and East Foothill Boulevard. It is a designated truck route between I-210 and Huntington Drive.



- **Mountain Avenue:** Mountain Avenue is constructed as four-lane undivided roadway running north-to-south from south of I-210 to north of East Foothill Boulevard, and an undivided two-lane roadway north of East Foothill Boulevard. In the Circulation Element it is classified as a Secondary Arterial between I-210 and East Foothill Boulevard. It is a designated truck route between I-210 and East Foothill Boulevard.

Existing Transit Conditions

Existing Rail Lines

The Metro “L” (Gold) Line light rail serves the city of Monrovia, with an alignment that generally parallels I-210. The closest station to the project is the Monrovia Station, located north of Duarte Road at 1675 S Primrose Ave, approximately 3 miles southwest of the project site.

Existing Bus Lines

Public transit access to the project site is provided by the Foothill Transit, Line 270. Line 270 runs primarily north-south along Peck Road to Primrose Avenue via South Myrtle Avenue. Line 270 has its terminus at Foothill Boulevard and Primrose Avenue, approximately 2 miles southwest of the project site.

Existing Bicycle Facilities

There are no existing bicycle facilities in the vicinity of the project site. The nearest access to an identified bicycle route is the junction of Norumbega Drive and East Greystone Avenue, approximately 0.5 mile south of the project site.

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

Less Than Significant Impact.

Construction

Vehicle trips that would be generated on a daily basis throughout each phase of construction would derive from construction workers and delivery of construction materials. The construction phase with the highest construction trip generation would be grading.

Based on preliminary construction operation estimates and preliminary grading plans, grading the project site would require approximately 252 cubic yards of soil to be exported from the site. Assuming that trucks with a 10-cubic yard capacity would be used during construction, approximately 26 round-trip truck trips are anticipated to be required. The grading period is expected to last for approximately 4 weeks. During peak grading periods, project construction is anticipated to generate an average of one to two daily haul trucks (two to four daily trips) that would be distributed throughout an 8-hour day.

In addition, project construction is projected to require a maximum of 16 round-trip construction worker trips and four vendor or delivery truck trips on a peak day. The majority of construction workers are anticipated to arrive and depart outside peak commute hours, while delivery trucks would arrive and depart throughout the day.



Operation

Operation of the project would not result in any significant effects relating to traffic. The project would construct one single-family residence on an existing residential street. The residence would be approximately 1 to 2 miles from the primary shopping centers, and 1 mile from the downtown area. The residence would cause a negligible increase in traffic trips and VMT on the existing roadway system. Impacts related to the performance of the circulation system would be less than significant. The project would not conflict with any program addressing the circulation system.

The General Plan Circulation Element has established policies that pertain to the project, such as policies related to accident and traffic safety, transit and public transportation, and bicycle routes and pedestrian facilities. These adopted policies include those summarized in Table 4-15, Project Consistency with Monrovia Circulation Element.

**Table 4-15
Project Consistency with Monrovia Circulation Element**

Circulation Element Policies	Project Consistency Analysis
GOAL 6: Protect and encourage non-motorized transportation such as bicycle and pedestrian travel.	
<u>Policy 6:8:</u> Require new developments to provide adequate pedestrian paths on adjacent streets, including wheelchair ramps, and through the development projects, where determined to be appropriate.	<u>Not Applicable.</u> The majority of houses on Norumbega Drive do not have sidewalks and the project does propose the installation of a sidewalk on the property. The project is consistent with other residences in the area and with the design of the existing roadway. Because the project cannot be conditioned to provide sidewalks on other properties and the project is consistent with the surrounding development pattern, this policy is not applicable.
GOAL 7: Develop and maintain a safe and efficient system of hillside streets and bike trails for movement of vehicles, people, and goods.	
<u>Policy 7:1:</u> Strictly follow hillside guidelines for new developments in hillside areas and design hillside streets to Hillside standards and specifications for circulation and street development.	<u>Consistent.</u> The project is located on an existing hillside street. The project would not permanently alter the hillside street. Under mitigation measure TRA-1, the applicant would prepare a Traffic Management Plan to manage construction traffic if required by the City; therefore, the project would not impact the movement of vehicles, people, or goods.
GOAL 8: Provide an adequate supply of convenient parking for all developments in the City, in a manner consistent with the goals of managing transportation demand and providing efficient arterial traffic flows.	
<u>Policy 8:2:</u> Require all new developments to provide off-street parking in compliance with the City's Zoning Code and the requirements of the ADA.	<u>Consistent.</u> The project includes a four-car garage, which exceeds the City's requirements for off-street parking.

The project does not include sidewalks. There is a sidewalk across the street from the project site at 558 Norumbega Drive, however, that is the only sidewalk in the vicinity. Although the project does not include a sidewalk, Norumbega Drive is a narrow, winding hillside street and does not include pedestrian facilities. Therefore, the project is consistent with its surroundings and provision of a sidewalk would not, by itself, create a safe pedestrian path. This impact is considered less than significant.



The City of Monrovia Bicycle Master Plan (Bicycle Master Plan) also sets forth a number of objectives and goals to promote and encourage bicycling. Under the Bicycle Master Plan, Norumbega Drive is not an existing or planned bicycle route.⁷⁶

The project site is not within 0.5 mile of a bicycle route or transit route. The project would not affect access or safety at existing bus or transit stops, nor would it hinder public transit service. Development of the project would not prevent the City from completing any proposed transit, bicycle, or pedestrian facilities.

In conclusion, the project would not conflict with adopted policies, plans, or programs, nor is it expected to negatively affect the performance or safety of existing or planned pedestrian, bicycle, or transit facilities. As such, the project would have a less than significant impact on active transportation and public transit.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. OPR, in implementing SB 743, issued proposed updates to the CEQA guidelines in November 2017 that amend the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refer to Section 15064.3(b)(1) of the CEQA Guidelines asking if the project would result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December 2018, and as of July 1, 2020, the provisions of the new section are in effect statewide. Concurrently, OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) (December 2018), which provides non-binding recommendations on the implementation of VMT methodology which has significantly informed how VMT analyses are conducted in the State.

In anticipation of the mandated change to VMT, the San Gabriel Valley Council of Governments (SGVCOG), of which the City is a participating agency, undertook the SGVCOG SB 743 Implementation Study (Implementation Study) to assist with answering important implementation questions about the methodology, thresholds, and mitigation approaches for VMT impact analysis in the member agencies. The City used the information produced through the Implementation Study to adopt a methodology and significance thresholds for use in CEQA-compliant transportation analyses. The new metric and thresholds of significance were formally adopted through City Council Resolution No. 2020-52 on July 7, 2020. In September 2020, the City released the City of Monrovia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (Transportation Study Guidelines), which set forth the City's study methodology, thresholds, and potential mitigation strategies for VMT impact analysis. The methodologies presented in this analysis are based on the Transportation Study Guidelines.

⁷⁶ City of Monrovia. 2018. *Bicycle Master Plan*. Available at: <https://www.cityofmonrovia.org/home/showdocument?id=19453>. Accessed September 17, 2021.



City Screening Analysis Criteria

Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. The City has adopted screening criteria, which may be applied to screen projects out of a detailed VMT analysis.⁷⁷ The project may be exempt from VMT analysis if it falls into one of the categories below. Table 4-16, Project Exemption Status based on Monrovia VMT Analysis Screening Criteria, presents screening criteria and project exemption status.

**Table 4-16
Project Exemption Status based on Monrovia VMT Analysis Screening Criteria**

Screening Criteria	Project Exemption Status
Project Type Screening	
<u>Projects generating fewer than 110 daily trips.</u> According to OPR’s research, a land use that generates 110 or fewer trips would not likely lead to a significant impact. Typical uses include: 11 single-family units, 16 multifamily units, 10,000 square feet of office space, and 15,000 square feet of industrial space.	<u>Exempt.</u> The project would construct one single-family residence and is under the typical use for this criterion of 11 single-family units.
<u>Retail projects up to 50,000 square feet I floor area.</u> These are considered local-serving and would therefore be likely to reduce VMT.	<u>Not Exempt.</u> The project is not a retail project.
Low VMT Screening	
<u>Residential projects located in low VMT areas of Monrovia.</u> Mapped areas with low VMT are defined as having 15% below the baseline VMT for the area.	<u>Not Exempt.</u> The project is mapped in an area with higher VMT than the regional average. This area is identified as an area where vehicle travel for residents is essential for mobility.
Transit Priority Area (TPA) Screening	
<u>Projects located within ½ mile of major transit stop or high-quality transit stop.</u> OPR has defined transit priority areas (TPAs) as being areas that are within a ½-mile radius of existing or planned major transit stops or existing stops along a high-quality transit corridor. There are five TPAs in Monrovia.	<u>Not Exempt.</u> The project is not within a mapped TPA.
Affordable Housing Screening	
Affordable housing developments and affordable housing units within mixed-use developments.	<u>Not Exempt.</u> The project would not construct an affordable housing unit.

Source: City of Monrovia. 2020g. *City of Monrovia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. Accessed September 24, 2021.

The project does not meet the criteria to be screened out of VMT analysis based on Low VMT Screening, Transit Priority Area Screening, or Affordable Housing Screening. However, the project does meet the Project Type exemption criteria for projects generating less than 110

⁷⁷ City of Monrovia. 2020g. *City of Monrovia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. Accessed September 24, 2021.



trips per day. According to OPR's research, a land use that generates 110 or fewer trips would not likely lead to a significant impact. Typical uses include: 11 single-family units, 16 multi-family units, 10,000 square feet of office space, and 15,000 square feet of industrial space. Hence the project, which will construct only one single family residence will have less than significant environmental impacts related to VMT without additional study. Therefore, the project would not conflict with CEQA Guidelines Sections 15064.3(b); impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The project would construct one single-family residence on an existing street. No roadway reconfigurations or similar design features would be needed for the project. Therefore, the project does not include design features that would create a hazard to traffic. No impact would occur.

Mitigation Measures: No mitigation measures are required.

d. Result in inadequate emergency access?

Less Than Significant with Mitigation Incorporated. As discussed in Response 4.9(f), project construction and operations would not interfere with any daily operations of the City of Monrovia Police Department (MPD) or Monrovia Fire and Rescue Department (MFD). The project would incorporate all applicable design and safety standards and regulations as set forth by the CBC, MPD, and MFD to ensure that it does not interfere with the provision of local emergency services (i.e., provision of adequate access roads to accommodate emergency response vehicles, minimum turning radii, adequate numbers/locations of fire hydrants, etc.).

Further, all appropriate fire and emergency access conditions would be incorporated into the project design. Prior to final site plan approval, the Project Sponsor would be required to submit plans to the MPD and MFD for review of compliance with applicable regulations. With implementation of the existing City standards and regulations, site access would be sufficient for emergency vehicles and impacts would be less than significant.

Should temporary partial lane closure be required during the construction phase, the Project Sponsor would be required to implement a Traffic Management Plan to maintain emergency access during the construction process and minimize congestion as stated in Mitigation Measure TRA-1. Thus, implementation of Mitigation Measure TRA-1 would reduce impacts concerning emergency access to less than significant.

Mitigation Measures:

TRA-1 Prior to project construction initiation, the Project Sponsor shall prepare a Traffic Management Plan for approval by the City Traffic Engineer. The Traffic Management Plan shall specify that one direction of travel in each direction on adjacent roadways must always be maintained during project construction activities. If full lane closures are required and one direction of travel in each direction cannot be maintained, the Traffic Management Plan shall identify planned



detours. The Traffic Management Plan shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and use of construction flag person(s) to direct traffic during heavy equipment use. The Traffic Management Plan shall be incorporated into project specifications for verification prior to final plan approval.



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4.18 Tribal Cultural Resources

<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or;		✓		
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

As of July 1, 2015, California AB 52 was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project.”

Public Resources Code Section 21074 codified AB 52 and defined a new category of resources under CEQA called “tribal cultural resources.” Tribal cultural resources are defined as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or that the lead agency has determined to be significant based on substantial evidence.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this environmental document.

Desktop analysis of the project site and surrounding 0.5-mile radius consisted of a records search of the CHRIS at the SCCIC and a SLF search by the NAHC. The CHRIS records search was completed to identify previous cultural resources studies and previously recorded cultural resources within a 0.5-mile radius of the project site. The SLF search was completed to identify any locations deemed sacred and/or tribal cultural resources by local Native American tribes. The CHRIS search results were provided on August 25, 2021, and included a review of the NRHP,



CRHR, California Points of Historical Interest list, California Historical Landmarks list, Archaeological Determinations of Eligibility list, and California State Historic Resources Inventory list. The records search also included a review of all available historical USGS 7.5-, 15-, and 30-minute quadrangles. No known cultural resources listed or eligible for listing in a State or local register of historic resources have been identified within the project site.

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

Less Than Significant With Mitigation Incorporated. The results of the CHRIS records search indicated that no cultural resources, including those listed or eligible for listing in a State or local register of historic resources, have been identified within the project site. One historic-age built environment resource (P-19-004717 [Spanish Canyon Motorway]) was identified approximate 0.24-mile northeast of the project site but would not be subject to any direct or indirect (e.g., visual or vibrational) impacts. As a result of the negative records search and lack of impacts to the historic-age Spanish Canyon Motorway (P-19-004717), the project would not affect any resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

The proposed earthwork for the project, however, would involve ground-disturbing activities within an undeveloped area. As a result, project construction has the potential to uncover previously undiscovered cultural resources that have not been evaluated for listing in a State or local register of historic resources. Any newly identified resources would need to be assessed for their eligibility. Implementation of Mitigation Measure CUL-1as outlined in Section 4.5 and Mitigation Measure TCR-1 would reduce impacts to unknown archaeological resources to less than significant.

Mitigation Measures:

Refer to Mitigation Measures CUL-1 and CUL-2.

TCR-1 Prior to the issuance of grading permits, a Native American Monitor from tribe(s) that consulted on this project pursuant to Assembly Bill 52, and a qualified archeologist shall be retained to monitor all ground-disturbing activities. Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. A sufficient number of Native American and archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. Should more than one Tribe request participation in monitoring, a rotating schedule will be implemented. The Native American and qualified archaeological monitors shall have the ability to recommend, with written and photographic justification, the termination of monitoring efforts to the City, and should the City and the qualified archaeologist concur with this assessment, then monitoring shall cease.

Prior to construction, a Native American representative shall present a WEAP training in cooperation with the qualified archaeologist. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural and



cultural resources. The WEAP will also cover the proper procedures in the event an unanticipated cultural or tribal cultural resource is identified during construction. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

A cursory pedestrian survey shall be completed by the Native American and archaeological monitors following vegetation removal. If previously unidentified cultural or tribal cultural resources are encountered during the cursory investigation and/or during ground-disturbing activities, the archaeological and Native American monitors shall have the authority to halt ground-disturbing activities within 100 feet of the resource(s) and an ESA physical demarcation shall be established. If historic-age or potential archaeological resources are identified, Mitigation Measure CUL-1 shall be implemented.

The Native American participant(s) shall determine whether the resource is a potential tribal cultural resource. If avoidance is not feasible, a qualified archaeologist, in consultation with the City and Native American participant(s), shall prepare and implement a detailed treatment plan. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, and excavation.

If human remains and/or grave goods are discovered or recognized at the project site, all ground disturbance shall immediately cease, and the county coroner shall be notified per PRC Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per PRC Section 5097.98(d)(1) and (2).

Any historical 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.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less Than Significant With Mitigation Incorporated No previously recorded resources were identified by the CHRIS records search. The results of the SLF were received from the NAHC on August 19, 2021, stating that the Gabrieleño Band of Mission Indians – Kizh Nation had identified a tribal cultural resource in the project vicinity. The NAHC recommended that the City contact the Gabrieleño Band of Mission Indians – Kizh Nation for more information.

In compliance with AB 52, the City distributed letters notifying each of the three Tribes that requested to be on the City's list for the purposes of AB 52 of the opportunity to consult



regarding the project. The letters were distributed by certified mail on May 25 and June 29, 2021.

- On June 9, 2021, the San Manuel Band of Mission Indians notified the City Planning Division that the project site was located outside of Serrano ancestral territory and, therefore, they would not be requesting consultation.
- The Gabrielino Tongva Indians replied on July 8, 2021, stating that the area is culturally sensitive and Native American Monitoring is required.
- The Gabrieleño Band of Mission Indians – Kizh Nation responded on June 3, 2021, stating that the project is within the tribe's ancestral tribal territory and requested consultation.

In lieu of a verbal consultation, the Gabrieleño Band of Mission Indians – Kizh Nation sent an email regarding the sensitivity of the area. The email provided confidential information relevant to tribal cultural resources that may exist within the area of the project site and identified concerns that the project may affect such resources during ground-disturbing activities. Thus, the project site was identified as sensitive for the presence of previously unidentified tribal cultural resources. They also provided a document listing proposed Mitigation Measures for the project. The Proposed Mitigation Measures included: 1) the retention of a Native American monitor to provide a WEAP training and monitor all ground-disturbing activities; 2) procedures in the event of the discovery of a tribal cultural resource, human remains, and/or grave goods; and 3) procedures for the burial of human remains, funerary remains, and grave goods. These measures have been incorporated into Mitigation Measure TCR-1.

As proposed earthwork for the project would involve ground-disturbing activities within an undeveloped area, project construction has the potential to uncover previously undiscovered tribal cultural resources. The implementation of Mitigation Measure TCR-1 would reduce impacts to unknown tribal cultural resources to less than significant.

Mitigation Measures: Refer to Mitigation Measure TCR-1.



4.19 Utilities and Service Systems

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental impacts?			✓	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c. Result in a determination by the wastewater treatment provider which services or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e. Comply with Federal, State and local management and reduction statutes and regulations related to solid waste?			✓	

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

Less Than Significant Impact.

Water

The City operates its own water utility service system, with all water obtained from five active wells located in the Main San Gabriel Basin with a total capacity of over 10,000 gallons per minute.⁷⁸ According to the City's Urban Water Master Plan, the City's water use was approximately 6,976 acre-feet in 2020, representing 154 gallons per capita per day in 2020.⁷⁹ As discussed in Section 4.14, Population and Housing, the average household size is 2.65

⁷⁸ City of Monrovia. 2021f. Water System. Available at: <https://www.cityofmonrovia.org/your-government/public-works/water>. Accessed September 20, 2021.

⁷⁹ City of Monrovia. 2021g. *City of Monrovia 2020 Final Urban Water Master Plan*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/884/637636765470270000>. Accessed September 20, 2021.



people and thus the project would result in approximately an additional 3 people. Therefore, the project would require an additional 462 gallons per day of potable water or approximately 0.52 acre-feet, which is less than 0.01% of the 2020 water demand.⁸⁰ As such, the project would not substantially increase water demand, and no new or expanded water facilities would be required to accommodate the project.

There is an existing water line in Norumbega Drive. Water service connections would be installed, connecting the one single-family residence to the existing water line within Norumbega Drive. Payment of development fees and connection fees to the City would be required. Additionally, the City would be required to review the project and issue a Will Serve letter stating that the City would supply water to the project prior project approval. No new off-site water facilities are proposed, nor are existing facilities proposed to be expanded, other than connections to the existing system. Therefore, this impact would be less than significant.

Wastewater Treatment

The City's sewer system delivers wastewater sewage to main lines leading to the Sanitation Districts of Los Angeles County San Jose Creek Water Reclamation Plant (Plant), located in the City of Whittier.⁸¹ The Plant provides primary, secondary, and tertiary treatment at a capacity of 100 million gallons of wastewater per day.

The Sanitation Districts of Los Angeles County provides wastewater generation factors for various land use types. Single-family residential uses are estimated to generate 260 gallons per day of wastewater per parcel.⁸² A sewer service connection would be made with the existing sewer line in Norumbega Drive. The City Public Works Department would be required to review the project and issue a Will Serve letter stating that the City would supply sanitation services to the project site prior to project approval. Therefore, the project would be adequately accommodated by the City's existing sewer system and the San Jose Creek Water Reclamation Plant, and this impact would be less than significant.

Stormwater Drainage

The project would construct a single-family residence on a hillside lot and would result in an increase in impervious surface area of approximately 3,900 square feet. Stormwater would flow down Norumbega Drive to Sawpit Wash and enter the wash through existing storm drains. There is no flooding history in Sawpit Wash. The project would be designed to comply with Municipal Code Section 12.36.100 and divert runoff to vegetated areas prior to discharge, which would reduce runoff rates from storms. Therefore, the project is not anticipated to result in impacts to the storm drain system and no new or expanded facilities are required. This impact would be less than significant.

⁸⁰ One acre-foot of water is equal to 325,851 gallons.

⁸¹ City of Monrovia. 2016. *Sewer System Management Plan*. Available at: <https://www.cityofmonrovia.org/home/showdocument?id=4776>. Accessed September 20, 2021.

⁸² Los Angeles County Sanitation Districts. *Table 1, Loadings for Each Class of Land Use*. Available at: <https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000>. Accessed September 20, 2021.



Dry Utilities

Electricity and natural gas services in the city are currently provided by Southern California Gas Company and Southern California Edison, respectively. Telecommunication services are provided by various companies. The project would result in the construction of a single-family residence and would require private on-site dry utilities associated with electricity, gas, and telecommunications. The Project Sponsor would be required to obtain Will Serve letters from Southern California Gas Company and SCE prior to project approval. Additionally, construction of the project’s dry utilities would be subject to compliance with all applicable local, state, and federal laws, ordinances, and regulations ensuring the project’s construction-related environmental impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

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. As stated in Response 4.19(a), the City would provide potable water service to the project site. The City relies on groundwater obtained from five active wells located in the Main San Gabriel Basin for supply. The Main San Gabriel Basin contains a total capacity of over 10,000 gallons per minute. Additionally, according to the City of Monrovia 2020 Urban Water Management Plan, the City is capable of purchasing imported water supplies from the Metropolitan Water District of Southern California (MWD), which can supply up to approximately 6,300 gallons per minute (gpm).⁸³ Historically, the City has not used imported water supplies to meet demands. According to the Urban Water Management Plan, the City is currently capable of meeting projected demands during normal, dry, and multiple dry years through 2045 in acre-feet (AF); refer to Table 4-17 through Table 4-19.

**Table 4-17
Normal Year Supply and Demand Comparison**

	2025	2030	2035	2040	2045
Supply totals	7,469	7,855	7,995	8,137	8,282
Demand totals	7,469	7,855	7,995	8,137	8,282
Difference	0	0	0	0	0

Source: City of Monrovia. 2020h. 2020 Urban Water Management Plan. Table 7-2. July.

**Table 4-18
Single Dry Year Supply and Demand Comparison**

	2025	2030	2035	2040	2045
Supply totals	7,274	7,649	7,786	7,920	8,066
Demand totals	7,274	7,649	7,786	7,920	8,066
Difference	0	0	0	0	0

Source: City of Monrovia. 2020h. 2020 Urban Water Management Plan. Table 7-3. July.

⁸³ City of Monrovia. 2020h. Urban Water Management Plan. Available at: <https://www.cityofmonrovia.org/your-government/public-works/water/urban-water-management-plan>. Accessed September 20, 2021.



Table 4-19
Multiple Dry Year Supply and Demand Comparison

		2025	2030	2035	2040	2045
First year	Supply Totals	7,719	8,117	8,262	8,409	8,559
	Demand Totals	7,719	8,117	8,262	8,409	8,559
	Difference	0	0	0	0	0
Second year	Supply Totals	8,222	8,646	8,800	8,957	9,117
	Demand Totals	8,222	8,646	8,800	8,957	9,117
	Difference	0	0	0	0	0
Third year	Supply Totals	8,490	8,928	9,087	9,249	9,414
	Demand Totals	8,490	8,928	9,087	9,249	9,414
	Difference	0	0	0	0	0
Fourth year	Supply Totals	8,145	8,565	8,718	8,873	9,031
	Demand Totals	8,145	8,565	8,718	8,873	9,031
	Difference	0	0	0	0	0
Fifth year	Supply Totals	6,747	7,095	7,222	7,351	7,482
	Demand Totals	6,747	7,095	7,222	7,351	7,482
	Difference	0	0	0	0	0

Source: City of Monrovia. 2020h. 2020 Urban Water Management Plan. Table 7-4. July.

The project's water demand is within the Urban Water Management Plan's water demand projection for the City, and the City anticipates having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

- c. **Result in a determination by the wastewater treatment provider which services or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. As stated in Response 4.19(a), project implementation would not require the relocation or construction of new or expanded wastewater treatment facilities. The project would construct one single-family residence. As such, the project is not anticipated to generate a substantial source of additional wastewater above existing conditions. Further, the City is expected to account for no more than 0.3% of the daily treated wastewater volume in the three receiving reclamation plants (the Whittier Narrows Reclamation Plant, the San Jose Creek Water Reclamation Plant, and the Los Coyotes Water Reclamation Plant), even if the County Sanitation Districts of Los Angeles County (wastewater reclamation plants operator) do not make any capacity improvements over their current treatment capacity.⁸⁴

⁸⁴ City of Monrovia. 2008. *Final Environmental Impact Report, Monrovia General Plan Proposed Land Use and Circulations Elements*.



Additionally, the City would need to provide a “Will Serve” letter, which indicates sufficient wastewater collection facilities and treatment capacity are available. As a result, the project’s wastewater demand, in addition to the City’s existing commitments, would not exceed capacity and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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. Athens Services provides solid waste collection for the City, including the project site, and disposes the City’s solid waste at the 11 landfills identified in Table 4-20, Landfills Serving the City of Monrovia.⁸⁵

**Table 4-20
Landfills Serving the City of Monrovia**

Name/Location	Waste from Monrovia in 2019 (tons per year)	Maximum Throughput per Day (tons)	Maximum Permitted Capacity (tons)	Remaining Capacity (tons)	Percent Remaining Capacity
Antelope Valley Public Landfill 1200 W. City Ranch Road Palmdale, CA 93551	114	5,548	30,200,000	17,911,225	59.3%
Azusa Land Reclamation Company Landfill Asbestos Containing Waste Disposal Site 1211 West Gladstone Street Azusa, CA 91702	4,132	8,000	80,571,760	51,512,201	63.9%
Chiquita Canyon Sanitary Landfill 29201 Henry Mayo Drive Castaic, CA 91384	2,090	12,000	110,366,000	60,408,000	54.7%
El Sobrante Landfill 10910 Dawson Canyon Road Corona, CA 91719	6,385	16,054	209,910,000	143,977,170	68.6%
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Access Road Irvine, CA 92618	471	11,500	266,000,000	205,000,000	77.1%
Mid-Valley Sanitary Landfill 2390 N. Alder Avenue Rialto, CA 92377	18,251	7,500	101,300,000	61,219,377	60.4%

⁸⁵ California Department of Resources Recycling and Recovery (CalRecycle). 2019a. *Jurisdiction Disposal by Facility and Alternative Daily Cover (ADC) Tons by Facility*. Available at: <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>. Accessed September 21, 2021.



Name/Location	Waste from Monrovia in 2019 (tons per year)	Maximum Throughput per Day (tons)	Maximum Permitted Capacity (tons)	Remaining Capacity (tons)	Percent Remaining Capacity
Olinda Alpha Landfill 1942 N. Valencia Avenue Brea, CA 92823	2,258	8,000	148,800,000	34,200,000	22.9%
San Timoteo Sanitary Landfill San Timoteo Canyon Road Redlands, CA 92373	5,874	2,000	22,685,785	12,360,396	54.4%
Simi Valley Landfill & Recycling Center 2801 Madera Road Simi Valley, CA 93065	1,300	64,750	119,600,000	82,954,873	69.4%
Sunshine Canyon City/County Landfill 14747 San Fernando Road, Sylmar Sunshine LF (in Los Angeles County), CA 91342	68	12,100	140,900,000	77,900,000	55.2%
Victorville Sanitary Landfill 18600 Stoddard Wells Road Victorville, CA 92307	723	3,000	93,400,000	79,400,000	85.0%
Total	41,666				

Data for year 2019.

Source: California Department of Resources Recycling and Recovery (CalRecycle). 2019b. SWIS Facility/Site Search. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>. Accessed September 21, 2021.

Construction

The project would construct one single-family residence on a vacant lot. Given the remaining capacity of area landfills (see Table 4-20), construction waste materials would not exceed the capacity of local or regional landfills. Further, all construction activities would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible.” The California Integrated Waste Management Act of 1989 requires that at least 50% of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2019 (or most recent) Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Compliance with these programs ensures the project’s construction-related solid waste impacts would be less than significant.



Operation

The proposed residence would generate approximately 12.23 pounds per day of solid waste.⁸⁶ To compare this to one of the landfills serving the City, this represents approximately 0.00008% of the maximum daily throughput at the Mid-Valley Sanitary Landfill. The remaining capacity of the landfills used by the City range from 22.9% to 85.0%. The single-family residence would be required to comply with all City and State regulations regarding solid waste. Therefore, the project would not generate solid waste more than state or local standards, or in excess of the capacity of local landfills, and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Refer to Response 4.19(d) above. The project would comply with all federal, state, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and the 2019 (or most recent) Green Building Code. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁸⁶ California Department of Resources Recycling and Recovery (CalRecycle). 2019c. Estimated Solid Waste Generation Rates. Available at: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed September 21, 2021.



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4.20 Wildfire

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

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

Less Than Significant Impact. As discussed in Section 4.9, Hazards and Hazardous Materials, the project site is within a Local Responsibility Area (LRA) in a very high fire hazard severity zone (VHFHSZ), as well as within in a Wildfire-Urban Influence (WUI).^{87,88} Monrovia Fire and Rescue has adopted the City of Monrovia Wildfire Protection Plan, which includes plans for evacuation of hillside residents due to wildfire.⁸⁹

The project site is accessible from Norumbega Drive, which is approximately 30 feet wide in the vicinity of the site. Project construction may temporarily block portions of Norumbega Drive, particularly during installation of utilities and delivery of materials by large vehicles. Therefore, mitigation is required to address traffic disruption during construction. Mitigation Measure HAZ-1 would require construction to stop and remove obstacles to traffic in the event of a wildfire emergency. Mitigation Measures TRA-1 would ensure adequate emergency access is maintained during construction. In the event of a wildfire, construction on the project would stop and all vehicles and materials would be removed from the street. During operation

⁸⁷ California Department of Forestry and Fire Protection (CAL FIRE). 2007. Fire Hazard Severity Zone Viewer. Available at: FHSZ Viewer (ca.gov). Accessed August 25, 2021.

⁸⁸ City of Monrovia. 2021b. *Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/26307/637624796825430000>. Accessed August 25, 2021.

⁸⁹ City of Monrovia. 2014. Fire and Rescue. *Community Wildfire Protection Plan*. Available at: <https://www.cityofmonrovia.org/home/showpublisheddocument/1836/636244055698530000>. Accessed September 15, 2021.



of the project, access to the site by fire and other emergency services would remain unchanged and therefore, even though the project is located in a VHFHSZ, construction of one single-family residence at this site would not impair an adopted emergency response plan or emergency evacuation plan. While the project site is located within a VHFHSZ within an LRA, impacts to emergency response and/or emergency evacuation plans are considered less than significant with implementation of Mitigation Measures HAZ-1 and TRA-1.

Mitigation Measures: Refer to Mitigation Measures HAZ-1 and TRA-1.

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

Less Than Significant Impact. Refer to Response 4.20(a). The project would not significantly increase ignition risks or fuel load within the project area. For these reasons, the project would not create a significant increase in exposure of people or structures to a significant risk or loss, injury or death involving wildland fires.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant With Mitigation Incorporated. The project would result in the construction of one single-family residence on Norumbega Drive, which is an existing residential street with existing utilities and infrastructure. The project would be required to extend utility laterals from existing utilities on Norumbega Drive to serve the property, including power and water. The project would not require extension of the road or other utilities, including for fire suppression as there is an existing hydrant approximately 100 feet from the project that would sufficiently serve the project site. Therefore, no impact would occur from project operation.

Project construction would include clearing vegetation from portions of a hillside in a Very High Fire Hazard Severity Zone. Because the project is located in the foothills of the San Gabriel Mountains with dry vegetation, construction may exacerbate fire risk temporarily as the site for the dwelling and landscaping is being cleared. Therefore, the project requires implementation of Mitigation Measure WFR-1, which would minimize fire risk during activities that would use electric equipment by requiring construction crews to carry fire prevention equipment during activities involving electrical equipment. Thus, the implementation of Mitigation Measure WRF-1 would reduce impacts related to fire risk to less than significant.

Mitigation Measure:

- WFR-1** During site clearing within the project site when any electrical construction equipment is in use, the construction crew shall have fire prevention equipment (such as fire extinguishers, emergency sandbags, etc.) accessible at all times to put out any accidental fires that could occur from the use of electrical construction equipment.



- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Less Than Significant Impact with Mitigation. Implementation of the project would result in the construction of one single-family residence on a hillside lot. As discussed in Response 4.7(a)(iv), Geology and Soils, Landslides, the project is in a mapped seismic landslide zone with slopes ranging from 1.5:1 to 2:1. The Geotechnical Analysis concluded that the proposed construction and grading for the residence would be safe against geotechnical hazards such as landslides, settlement, or slippage. The residence and retaining walls would be developed in accordance with the 2019 CBC (or most recent version), which is further enforced through implementation of SC GS-1 and Mitigation Measure GS-1, thus minimizing the potential for post-fire slope instability. Therefore, with the implementation of SC GS-1 and Mitigation Measure GS-1, the project would have a less than significant potential to 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; this impact would be less than significant.

Standard Conditions: Refer to SC GS-1.

Mitigation Measures: Refer to Mitigation Measure GS-1.



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4.21 Mandatory Findings of Significance

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		✓		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

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

Less Than Significant Impact With Mitigation Incorporated. As concluded in Section 4.4, Biological Resources, the project site would retain and protect all oak trees and include measures to protect nesting birds and special-status reptiles during construction. Therefore, impacts to sensitive plant or animal species would be less than significant with mitigation incorporated.

As indicated in Section 4.5, Cultural Resources, Section 4.7, Geology and Soils, and Section 4.18, Tribal Cultural Resources, impacts on cultural, paleontological, or tribal cultural resources are not anticipated to occur. Nonetheless, due to the proposed excavation, there is a possibility that unknown cultural resources may be uncovered during site disturbance activities. In the unlikely event that previously unidentified cultural resources are encountered during ground-disturbing activities, Mitigation Measure CUL-1 and CUL-2 would require all project construction efforts in the immediate area to halt until an archaeologist evaluates the find and recommends a course of action. Mitigation Measure TCR-1 would require a Tribal



Monitor during site disturbance activities and implementation of appropriate actions should unknown tribal cultural resources be discovered during site disturbance. Further, if evidence of subsurface paleontological resources is found during construction, SC GS-2 would ensure that project construction activities would cease within 50 feet of the discovery and the City Planning Division be contacted. With direction from the City Planning Division, a qualified paleontologist may be contacted to evaluate the find and recommend a course of action.

Thus, with implementation of Mitigation Measures CUL-1, CUL-2, and TCR-1, and SC GS-2, the project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 4.1 through 4.20, the project would not result in any significant impacts in any environmental categories with implementation of standard conditions and project mitigation measures. As discussed in Response 4.3(b), 4.8(a), 4.8(b), and 4.13(a) — pertaining to cumulative air quality, greenhouse gas emissions, and noise, respectively — the incremental effects of the project would be less than considerable when viewed in connection with the effects of past projects, current projects, or probable future projects. Therefore, impacts would be less than significant.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this Initial Study reviewed the project’s potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous sections, the project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework, standard conditions, and mitigation measures. Thus, impacts would be reduced to less than significant.



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6.0 REPORT PREPARATION

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7.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in this Initial Study, we recommend the City of Monrovia prepare a Mitigated Negative Declaration for the Norumbega Drive Residence Project. We find the project could have a significant effect on certain environmental issues but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend the second category be selected for the City of Monrovia's determination (see Section 6.0, Lead Agency Determination).

Date

Bobbette Biddulph, Senior Project Manager
SWCA Environmental Consultants



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8.0 LEAD AGENCY DETERMINATION

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.

Signature: Vincent Gillespie

Title: Planning Technician

Printed Name: Vincent Gillespie

Agency: City of Monrovia

Date: 2/23/22



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