



ADDENDUM #1 TO THE FINAL INITIAL
STUDY/MITIGATED NEGATIVE DECLARATION
FOR THE BRADBURY ROAD WIDENING PROJECT

SCH#2022090411

Lead Agency:

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1. REGULATORY SETTING

Pursuant to Section 21166 of the California Environmental Quality Act (CEQA) and Section 15162 of the State CEQA Guidelines, when an Environmental Impact Report (EIR) has been certified or a Mitigated Negative Declaration (MND) adopted for a project, no subsequent EIR or MND shall be prepared for the Modified Project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or MND.
 - b. Significant effects previously examined will be substantially more severe than identified in the previous EIR or MND.
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives.
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR or MND would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR or MND shall be prepared if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR/MND have occurred.

On December 13, 2022, an MND was approved for the Bradbury Road Widening Project, (State Clearinghouse [SCH] #2022090411). On January 17, 2023, an interested party commenced litigation challenging the City of Bradbury's decision to approve the Project. Subsequently, several changes were made to the Project through the settlement process (Modified Project). The Modified Project proposes to reduce the width of Wildrose Avenue from the originally approved 36 feet to 26 feet, which would require an expansion of 2 feet north, as opposed to the original proposed expansion of 10 feet to the north. Additionally, the Modified Project proposes to maintain the expansion width of Bradbury Road, from the existing 24 feet to 36 feet; however, the center line would be slightly shifted to allow for safer turning radii of northbound and southbound traffic. Lastly, the Modified Project would decrease the proposed length and height of the retaining wall from 270 linear feet to approximately 80 feet, and from 5 to 13 feet in height to 4.5 to 5.5 feet in height from the roadway.

This Addendum reviews the changes proposed by the Modified Project and any changes to the existing conditions that have occurred since the Final MND was certified. It also reviews any new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time that the Project was approved. It further examines whether, as a result of any changes or any new information, a subsequent MND or EIR may be required. This examination includes an analysis

pursuant to the provisions of Section 21166 and Section 15162 of the State CEQA Guidelines, which includes an analysis of potential environmental impacts on a topic-by-topic basis.

On the basis of the findings of the Modified Project and the provisions of the State CEQA Guidelines, the City of Bradbury, as the Lead Agency, determined that, as documented in this Addendum to the previously Certified Final MND, no subsequent MND or EIR is required to review the Modified Project application.

2. BACKGROUND

On December 13, 2022, the City of Bradbury City Council approved the Bradbury Road Widening Project (Approved Project) and IS/MND (Approved IS/MND). The Approved Project included widening the existing Bradbury Road from 24 feet to 36 feet, providing one 18-foot lane in each direction, from Winding Oak Lane to Deodar Lane. The road widening would extend north of Wildrose Avenue beyond the existing roadway limits. Several oak trees would be removed as a result of proposed widening. Existing slopes adjacent to the roadway would be regraded and a new retaining wall would be installed north of Wildrose Avenue. The Project would include associated hardscape and landscaping improvements along the roadway (see Figure 1, *Previously Approved Site Plan*). The Approved Project has not been constructed.

The Approved IS/MND identified biological resources, cultural resources, geology/soils/paleontological resources, tribal cultural resources, and Mandatory Findings of Significance as environmental topics that could potentially result in significant impacts and included mitigation measures. All potential significant impacts were determined to be less than significant with the incorporation of the mitigation measures identified in the Approved IS/MND. Environmental impacts related to aesthetics, agriculture and forestry resources, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, utilities/service systems, and wildfire were determined to result in less-than-significant impacts or no impacts.

3. EXISTING SETTING

3.1. PROJECT LOCATION

The modified Project site is located in the San Gabriel Valley region of Los Angeles County, California, on the boundary of and within both the City of Bradbury and the City of Monrovia. The site is within the United States Geological Survey (USGS) Azusa 7.5-Minute Series Quadrangle and is within Section 25, Township 1 North, Range 11 West. The City of Bradbury is approximately 16 miles northeast of downtown Los Angeles and 26 miles north of downtown Santa Ana. The regional location of the Project site is shown in Figure 2, *Regional Location*.

The Project site is located on Bradbury Road and Wildrose Avenue on the western border of the City of Bradbury and eastern border of the City of Monrovia. The Project site is bounded by Deodar Lane to the north, Winding Oak Lane to the south, single family residential properties to the west, and the Bradbury Estates community to the east. Regional access to the Project site is available by Interstate 210 (I-210) and I-605 via Mount Olive Drive and Royal Oaks Drive. The Project site and the surrounding area are shown in Figure 3, *Local Vicinity*.

3.2. EXISTING PROJECT SITE

The Modified Project site consists of approximately 1.38 acres and is currently developed with a local roadway (Wildrose Avenue/Bradbury Road). The Modified Project site generally follows Bradbury Road (north-south), which becomes Wildrose Avenue (west-east), from Winding Oak Lane to the south to Deodar Lane approximately 650 roadway feet to the north.

The existing roadway is 24 feet in width and is flat with trees and shrubs directly abutting the east side of Bradbury Road and steep slopes extending north of Wildrose Avenue. Slopes north of Wildrose Avenue support dense tree coverage and are bordered by a chain-link fence near the roadway. The roadway right-of-way includes curbs and gutters, sidewalks, and ornamental landscaping. Additional features include overhead utility lines, streetlights, and roadway signage. A single-family residential neighborhood is directly west of Bradbury Road. The Project site’s existing conditions are shown in Figure 4, *Aerial View*, and Figure 5, *Existing Site Photos*.

3.3. EXISTING GENERAL PLAN AND ZONING DESIGNATION

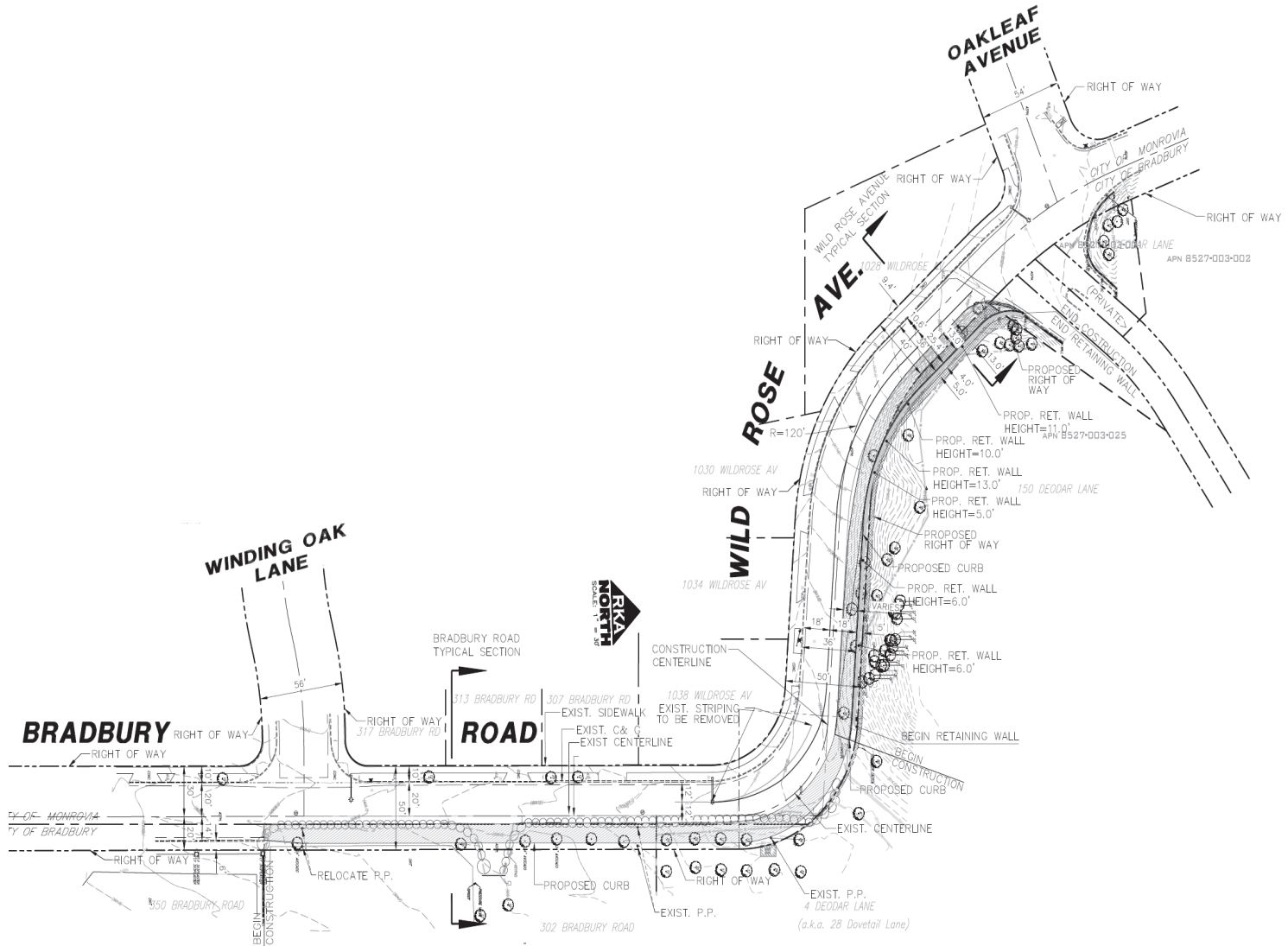
The existing underlying land use and zoning designations of the site are as follows:

Table 1: Existing General Plan and Zoning

City	General Plan	Zoning
City of Bradbury	A-5 (Agriculture Residential Estate)	A-5 (Agriculture Residential Estate Zoning District)
City of Monrovia	Residential Low (5.8 dwelling units [du] per acre)	Residential Low

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Previously Approved Site Plan

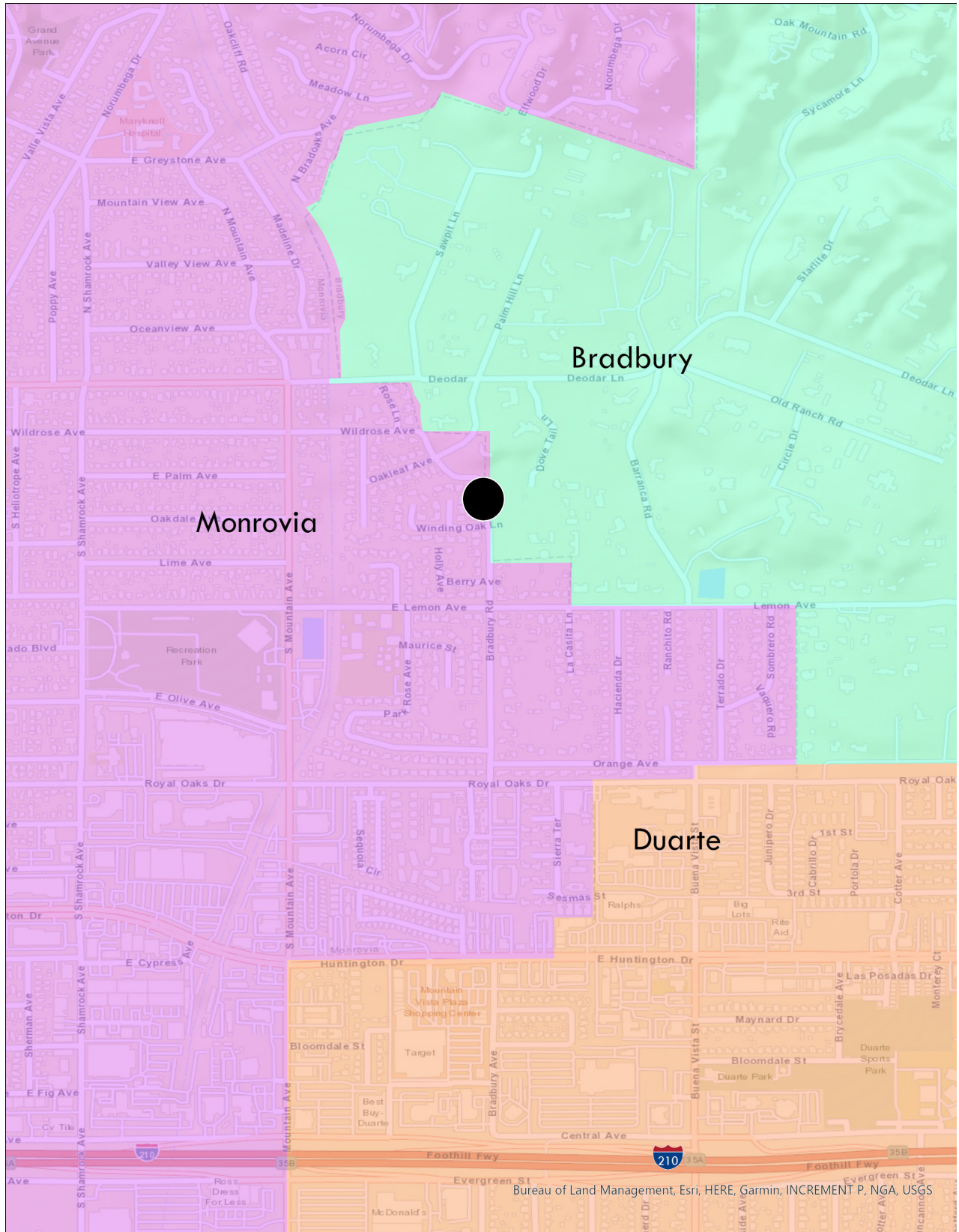


Bradbury Road Widening Project

Figure 1

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Regional Location



Bradbury Road Widening Project

Figure 2

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Local Vicinity



Bradbury Road Widening Project

Figure 3

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Aerial View of Site and Vicinity



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Existing Views



Northbound views of the northeastern boundary of the Project Site from Bradbury Road.



Southbound views of the southeastern boundary of the Project Site from Bradbury Road.



Westbound views of the northern boundary of the Project Site from Wildrose Avenue.

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4. PROJECT DESCRIPTION

The Approved IS/MND analyzed the 1.38-acre Project site which included widening the existing Bradbury Road from 24 feet to 36 feet and providing one 18-foot lane in each direction from Winding Oak Lane to Deodar Lane. The road widening would extend north of Wildrose Avenue and east of Bradbury Road beyond the existing roadway limits. Several oak trees would be removed as a result of the proposed widening. Existing slopes adjacent to the roadway would be regraded to match the new roadway alignment and a new retaining wall would be installed north of Wildrose Avenue to secure the vegetated slopes.

The City of Bradbury has since modified the Approved Project plans. The Modified Project proposes a reduced roadway width, reduced grading, and a reduced retaining wall, described below.

4.1. PROJECT OVERVIEW

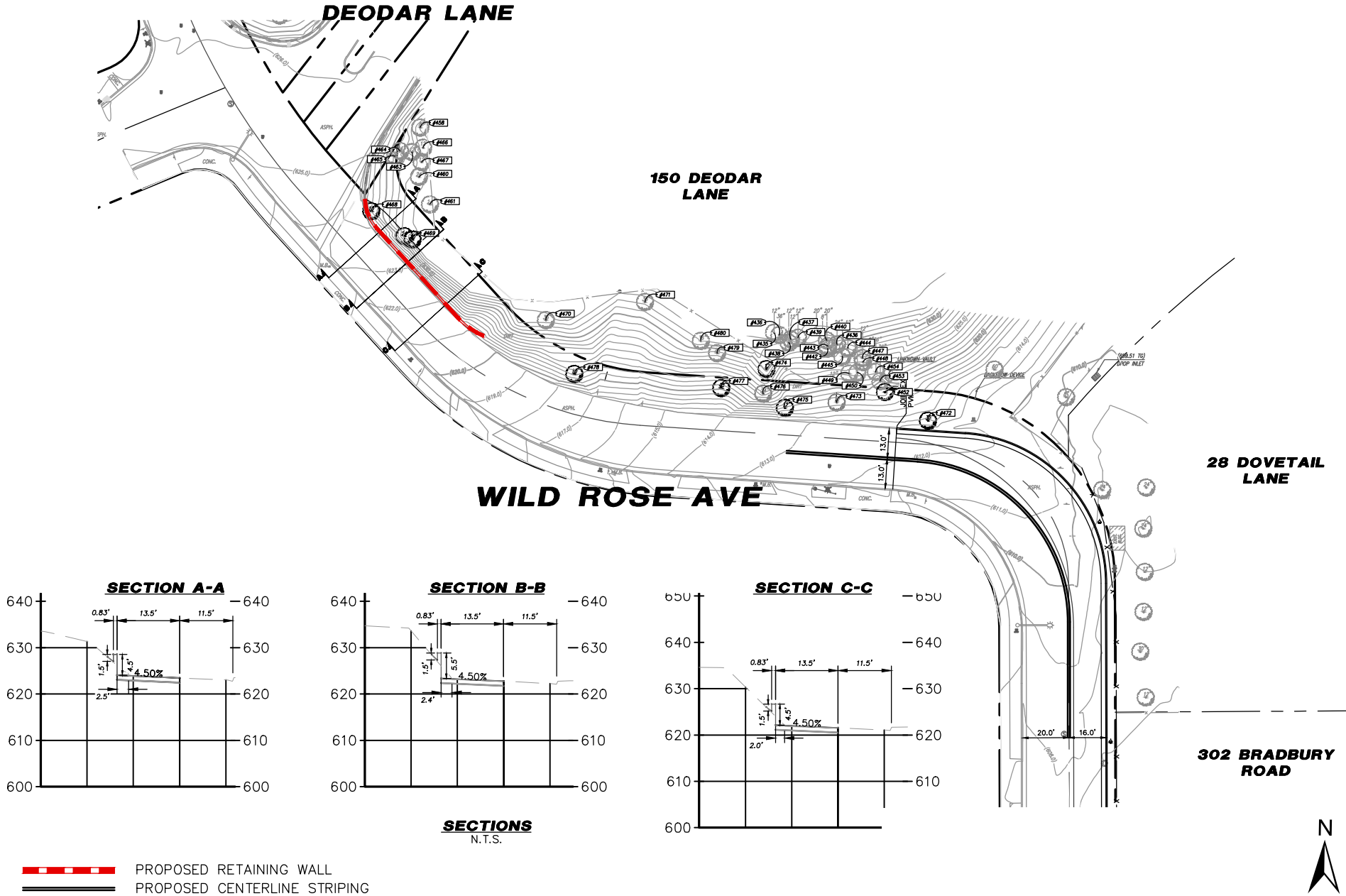
The Modified Project includes minor revisions to the approved site plan; however, it would maintain the overall area of impact of 1.38 acres from the originally Approved Project. The Modified Project proposes to reduce the width of Wildrose Avenue from the originally approved 36 feet to 26 feet, which would require an expansion of the existing roadway 2 feet to the north, as opposed to the original proposed expansion of 10 feet to the north. Wildrose Avenue would include a 13-foot-wide lane in both the westbound and eastbound directions. Similar to the Approved Project, the Modified Project would rely on additional right-of-way acquired for the Project from private property to the north (accessor's parcel number [APN] 8527-026-025) to accommodate proposed widening and recorded with the County of Los Angeles.

The Modified Project proposes to maintain the expansion width of Bradbury Road, from the existing 24 feet to 36 feet; however, the center line would be slightly shifted to allow for safe turning radii of northbound and southbound traffic. Bradbury Road would include a 20-foot-wide lane in the southbound direction and a 16-foot-wide lane in the northbound direction. Like the Approved Project, the proposed widening of Bradbury Road under the Modified Project would be accommodated by existing City right-of-way.

Lastly, the Modified Project would decrease the proposed length and height of the retaining wall. The proposed length would decrease from 270 linear feet to approximately 80 linear feet. The proposed height would decrease from a range of 5 to 13 feet in height to a range of 4.5 to 5.5 feet in height (from the roadway). Figure 6, *Modified Project Components*, illustrates conceptual modifications to the Approved Project. Proposed roadway widening and retaining wall improvements would be constructed in a manner similar to that depicted in Figure 6.

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Modified Project Components



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4.2. CONSTRUCTION

The Modified Project would be constructed in one phase for a duration of approximately 2 months. Approximately 6,640 square feet (SF) would be graded as part of the Project and would require roughly 25 cubic yards of soil export. Construction is expected to result in the removal of 145 tons of debris.

5. DISCRETIONARY APPROVALS AND PERMITS

The following discretionary approvals, permits, and studies are anticipated to be necessary for implementation of the Modified Project:

- Approval of IS/MND Addendum for the Modified Project
- Tree Permit

Additionally, the following discretionary approval and permit is anticipated from the City of Monrovia to be necessary for implementation of the proposed Project:

- Encroachment permit

6. CEQA ANALYSIS

The Modified Project proposes the widening of Bradbury Road/Wildrose Avenue. The Modified Project would result in an overall reduction of impacts compared to the previously Approved Project. A summary of the Project's impacts is provided in Table 2 below.

Table 2. Project Impacts

Environmental Topic	Impacts
<p>Aesthetics</p>	<p>Less Than Significant Impacts. The Project is within a small urbanized and developed residential area on the border of the City of Bradbury and City of Monrovia. The Project site is not within or adjacent to a scenic vista. However, existing public viewpoints exist along Bradbury Road, where views of the San Gabriel Mountains can be seen to the north by pedestrians and motorists. The Approved IS/MND determined the Project would result in less-than-significant impacts on a scenic vista.</p> <p>The Project site is not within a scenic highway and no impacts were determined to occur.</p> <p>The Project site is currently developed with Bradbury Road, residential driveways and lawn to the west, and lush natural vegetation consisting of trees and shrubs to the east. The visual quality of the Project site would be considered moderate to high and visual character is consistent with aesthetics of a typical suburban residential neighborhood. Visual changes that would result from the Approved Project were determined to be minor since improvements would be required to be consistent with the City's Design Guidelines (1995), Chapter 118 of the City's Municipal Code, and the City's tree ordinance. The Approved Project was determined to not degrade the existing visual character, and impacts would be less than significant.</p> <p>Lastly, existing sources of light in the vicinity of the Project site include streetlights and internal and external residential lighting along Bradbury Road, as well from vehicles driving along Bradbury Road. The Approved Project construction would occur during permitted hours (permitted construction activities from 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 7:00 p.m. on weekends). Approved Project operation would not result in any new lighting or glare sources.</p>

	<p>The Modified Project would include a smaller Project footprint and would result in fewer trees required to be removed. Additionally, the Modified Project proposes a smaller retaining wall than the Approved Project. No new visual obstructions to views from the roadway to the mountains would be introduced under the Modified Project. Reduced changes to the existing Project site would result in fewer impacts to visual character and quality. Modified Project construction would remain consistent with what was analyzed under the Approved Project. Therefore, the Modified Project would result in less-than-significant impacts and would be consistent with findings from the Approved IS/MND.</p>
<p>Agriculture and Forest Resources</p>	<p>No Impacts. The Approved IS/MND determined that the Approved Project would result in no impacts to agriculture and forestry resources. According to the California Department of Conservation’s Important Farmland Finder, the site is classified as Nonagricultural or Natural Vegetation. Additionally, the site is zoned Agricultural Residential Estate Zoning District (A-5) by the City and is not designated as agricultural or forest land. The Modified Project would result in similar changes as the Approved Project. The site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Modified Project would result in no impacts and would be consistent with findings from the Approved IS/MND.</p>
<p>Air Quality</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less than significant construction air quality impacts. The Approved Project would result in negligible operational emissions related to periodic debris clearing and maintenance activities. The Approved Project construction would not exceed any of the criteria pollutant thresholds applicable to the Project site.</p> <p>The Modified Project would result in a smaller impact area compared to the Approved Project. Less grading would be required under the Modified Project than what was previously analyzed under the Approved Project (25 cubic yards [CY] of export compared to 322 CY of export previously required). As a result, overall construction impacts on air quality would be less than that of the Approved Project. Modified Project operation would be the same as the Approved Project operation and would not result in increased capacity. The Modified Project would result in less-than-significant impacts and would be consistent with the findings in the Approved IS/MND.</p>
<p>Biological Resources</p>	<p>Less Than Significant Impacts With Mitigation. A General Biological Assessment was prepared for the Project by Hernandez Environmental Services in 2021. The Project site is surrounded by residential development and woodlands. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) were found to occur on the site during the site survey.</p> <p>The Project site contains two habitat types, including 1.09 acres of developed areas and 0.29-acre of coast live oak woodland habitat. The City’s General Plan includes Open-Space Policy No. 1: Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration. In addition, Chapter 118 of the City’s Municipal Code includes the City’s tree ordinance, which specifies the requirements for removal, preservation, and replacement of native, prominent, and/or significant trees.</p> <p>A Native Tree Survey and Arborist Report was prepared for the Project by Golden State Land & Tree Assessment in 2021 to classify the status of trees within and directly northeast of the Project site. In total, up to 46 trees were determined to potentially be removed as part of the Approved Project. Mitigation was included to require preparation of a tree preservation and replanting plan and monitoring plan. The plan will detail how the City will replace native and prominent trees at a 1:1 ratio with 15-gallon trees of the same species and how to monitor for long term health of the trees. Additionally, mitigation included requirement for an arborist to be present during Project construction to</p>

	<p>determine whether trees would need to be removed or not based on health. Tree removal would be avoided unless necessary. Mitigation measures (MM) BIO 1, MM BIO-2, MM BIO-3, and MM BIO-5 were determined to reduce impacts of the Approved Project to less than significant.</p> <p>The Project site and adjacent areas are located within a developed urban area and do not contain natural wetlands. Therefore, the Approved Project did not result in impacts to wetlands.</p> <p>Migratory non-game native bird species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests. Trees and shrubs located on the Project site can be used by nesting songbirds or raptors during the nesting bird season of February 1 to September 15. Therefore, Mitigation Measure BIO-4 was included to require that if vegetation clearing for the Approved Project occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of vegetation clearing activities to confirm the absence of nesting birds. With implementation of Mitigation Measure BIO-4, potential impacts of the Approved Project to nesting birds would be less than significant.</p> <p>The Modified Project would maintain the 1.38-acre Project footprint from the originally Approved Project. Based on the latest site plans of the Modified Project, two trees would be directly impacted by the proposed roadway widening, and two additional trees are diseased and/or dying and would likely require removal as part of the Modified Project. Therefore, the Modified Project impact on trees would be greatly reduced. An arborist would monitor construction and make determinations regarding additional trees that may need to be removed due to risk of tree failure and the public safety of drivers and nearby residents. The Modified Project would require preconstruction bird surveys, similar to the Approved Project. Therefore, the Modified Project would require implementation of MMs BIO-1 through BIO-5 included in the Approved IS/MND, but would result in reduced impacts compared to the Approved Project. The Modified Project would result in less-than-significant impacts with mitigation and would be consistent with findings from the Approved IS/MND.</p>
<p>Cultural Resources</p>	<p>Less Than Significant Impacts With Mitigation. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts to cultural resources with mitigation incorporated. Project grading is anticipated to remain within the artificial fill material but has the potential to encroach into native soils that have not been previously disturbed and could contain archeological resources. As a result, Mitigation Measure CUL-1 has been included to provide procedures to be followed in the event that potential archaeological resources are discovered during grading, excavation, or construction activities. Mitigation Measure CUL-1 requires that work in the vicinity of a find be halted until the find can be assessed for significance by a qualified archaeologist to determine the appropriate treatment and documentation of the discovery.</p> <p>The Modified Project would have a smaller impact footprint than the Approved Project and would overall result in less impacts than the Approved Project. Like the Approved Project, the Modified Project would require implementation of Mitigation Measure CUL-1 in the case of an inadvertent discovery. The Modified Project would result in less-than-significant impacts with mitigation and would be consistent with findings from the Approved IS/MND.</p>
<p>Energy</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts to energy resources. construction of the Approved Project would require energy from petroleum-based fuels to power construction vehicles and equipment, electricity to provide temporary power, and energy to produce construction materials such as asphalt. Project operation would not require consumption of energy. Through compliance with the CALGreen Building Code as included</p>

	<p>in the City’s Municipal Code (Chapter 150.001) to ensure efficient use of energy (included as PPP ENG-1), the Approved Project would not result in wasteful, inefficient, or unnecessary consumption of energy.</p> <p>Construction of the Modified Project widening would require less grading and a decrease in energy consumption during construction as compared to the previously Approved Project. Similar to the Approved Project, the Modified Project would not require the consumption of energy. Additionally, the Modified Project would also be required to comply with PPP ENG-1, and would therefore not result in wasteful, inefficient, or unnecessary consumption of energy to complete construction. Therefore, impacts would be less than significant, consistent with the Approved Project.</p>
<p>Geology and Soils</p>	<p>Less Than Significant Impacts With Mitigation. The Approved IS/MND determined that the with implementation of mitigation, the Approved Project would have less-than-significant impacts to cultural resources. The Project site is located in an Alquist-Priolo Fault Zone as shown in the California Department of Conservation’s <i>California Earthquake Hazards Zone Application</i>, and like most of California, is subject to ground-shaking hazards from earthquakes on regional fault systems capable of producing moderate to severe ground shaking. However, the Approved Project does not include the development of any land uses that would subject additional persons to risks associated with rupture of a known earthquake fault.</p> <p>Construction of the Approved Project has the potential to contribute to soil erosion and the loss of topsoil. Excavations and grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the City and the Regional Water Quality Control Board (RWQCB) regulations developed by a Qualified SWPPP Developer (QSD), which would be implemented by PPP WQ-1.</p> <p>The Project site is outside of areas determined to be susceptible to landslide or liquefaction; however, the Project site is subject to risk of seismic-related strong ground shaking. Steep slopes to the north of Bradbury Road would be graded as part of the Approved Project to accommodate proposed roadway widening. Under the Approved Project, a retaining wall would be implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events.</p> <p>The Approved Project included demolition of existing asphalt, grading of the Project site, and roadway pavement and roadway restriping in order to widen the exiting Bradbury Road from 24 feet to 36 feet. Grading under the Approved Project was determined to have the potential to encroach into native soil that has not been previously disturbed and could contain paleontological resources. Therefore, Mitigation Measure PAL-1 was included to provide procedures during grading or excavation activities. Mitigation Measure PAL-1 requires that work cease within 50 feet of a find until a qualified paleontologist has evaluated the find in accordance with federal and State regulations. Mitigation Measure PAL-1 reduced potential impacts to undiscovered paleontological resources to a less than significant level.</p> <p>The Modified Project would reduce proposed roadway expansion, which would reduce required grading and size of the proposed retaining wall. Overall, the Modified Project would result in less impacts on soil erosion due to reduced grading; however, PPP WQ-1 would still be required and implemented. Potential impacts due to seismic ground shaking would be similar to the Approved Project, since the site conditions are the same and the proposed retaining wall would protect the roadway and adjacent residences from potential geological hazards. Additionally, the Modified Project would have a smaller impact footprint than the Approved Project and would overall result in less impacts to paleontological resources than the Approved Project. However, the Modified Project would require implementation of Mitigation Measure PAL-1 in the case of an</p>

	<p>inadvertent discovery. The Modified Project would result in less-than-significant impacts with mitigation and would be consistent with findings from the Approved IS/MND.</p>
<p>Greenhouse Gas Emissions</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant greenhouse gas (GHG) emissions impacts. The Approved Project was found to result in a total of approximately 1.0 MTCO₂E amortized over 30 years. The Approved Project would result in negligible operational emissions related to periodic debris clearing and maintenance activities.</p> <p>The Modified Project would result in a smaller impact area compared to the Approved Project. Less grading would be required under the Modified Project compared to what was previously analyzed under the Approved Project (25 CY of export compared to 322 CY of export previously required) and overall construction impacts on GHG would be less. Modified Project operation would be the same as the Approved Project operation. The Modified Project would result in less-than-significant impacts and would be consistent with findings from the Approved IS/MND.</p>
<p>Hazards and Hazardous Materials</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts related to hazards and hazardous materials. The Approved Project found that construction activities including routine transport and use of hazardous materials during construction would be less than significant. The Approved Project found that operation would not include land uses or activities that require routine transport, use, or disposal of hazardous materials. Therefore, operation of the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.</p> <p>The Approved Project found that through implementation of the City’s Municipal Code Section 9.109.050 (included as PPP WQ-1), risk of significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during Project construction would result in a less-than-significant impact.</p> <p>The Approved Project found that the emissions generated from construction and operation of the Project, evaluated in the air quality analysis discussed above, would not cause or contribute to an exceedance of the federal or State air quality standards. Project operation would not include the generation or transport of hazardous materials. Therefore, the Project would not emit hazardous or handle acutely hazardous materials, substances, or waste near a school, and impacts would be less than significant.</p> <p>The Approved Project site is not located on the Department of Toxic Substances Control’s date management system, EnviroStor, as a contamination site. Additionally, Bradbury Road is identified as a primary evacuation route within the City General Plan and provides access to East Lemon Avenue in the event of an evacuation. Temporary roadway closure would be coordinated by the City with emergency service providers in both the Cities of Bradbury and Monrovia (included as PPP HAZ-1). Therefore, impacts related to interference with an adopted emergency response or evacuation plan during construction activities would be less than significant.</p> <p>The Modified Project would implement PPP WQ-1 and PPP HAZ-2, consistent with the Approved Project. The Modified Project would result in less than significant impacts and would be consistent with findings from the Approved IS/MND.</p>
<p>Hydrology and Water Quality</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts to hydrology and water quality. The Proposed Project found that construction and use of equipment had the potential to degrade the quality of water. However, the Approved Project would implement a stormwater pollution prevention plan (SWPPP) (Included as PPP WQ-1) and adhere to</p>

	<p>City’s plan check and permitting process, thus impacts would be less than significant. The Approved Project would include construction of a retaining wall to support slopes and stabilize soils from potential erosion, minimizing the discharge of sediment into receiving waterbodies. Therefore, the Project would result in a less-than-significant impact.</p> <p>Operation of the Approved Project would not require pumping or construction of groundwater. Therefore, the Project would result in a less-than-significant impact on groundwater recharge. The Approved Project site does not contain, nor is adjacent to, a stream, river, creek, or other flowing water body. Thus, impacts related to alteration of the course of a seam or river would not occur.</p> <p>The Approved Project is not located near a large body of surface water and the proposed retaining and revegetation would reduce the risk of mudflow on the Project site. Thus, implementation of the Approved Project would not expose people or structures to a significant risk of loss, injury, or death, involving inundation by seiche, tsunami, or mudflow that could release pollutant due to inundation for the Project site. As shown in Appendix A, the Project would result in a negligible increase in impervious surface area, and existing drainage would accommodate the Project’s stormwater runoff. Therefore, the Approved Project was determined to result in less-than-significant impact.</p> <p>The Modified Project would decrease grading, slightly decreasing impervious surface area and thus reducing the amount of surface runoff. The Modified Project would require a SWPPP like the Approved Project. Therefore, the Modified Project would result in less-than-significant impacts related to hydrology and water quality consistent with the Approved Project.</p>
<p>Land Use and Planning</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impact to land use and planning. The Project intends to widen an existing roadway that serves the communities of Bradbury and Monrovia and does not divide either community. Additionally, the Project would not change the nature of the current land use, nor does it propose any changes to the current land use and zoning designation. The Project would not conflict with any applicable zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect, and the Project would result in no impact.</p> <p>The Modified Project is similar to the Approved Project, but with a reduction in the width of Wildrose Avenue and a decrease in the length and height of the retaining wall. As such, the Modified Project would result in the same impacts to land use and planning. Therefore, the Modified Project would result in no impact, consistent with the Approved IS/MND and no new impacts would occur.</p>
<p>Mineral Resources</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impact to mineral resources because there are no Mineral Resource Zones (MRZ) in the City of Bradbury. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents, and no impacts would occur.</p> <p>Construction under the Modified Project site would occur within the same site analyzed for the Approved Project. Therefore, the Modified Project would result in no impact to mineral resources, consistent with the Approved IS/MND and no new impacts would occur.</p>
<p>Noise</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts. Project construction would be done during the allowable construction hours as provided by the City of Bradbury and City of Monrovia Municipal Codes. In general, both cities allow for construction from 7:00 a.m. to 7:00 p.m. on weekdays, the City of Monrovia Municipal Code Section 9.44.040 allows construction-generated noise level increases from the hours 9:00 a.m. to 6:00 p.m. on</p>

	<p>weekends, and the City of Bradbury Municipal Code Sec. 9.127.040 prohibits construction noise on holidays.</p> <p>In addition, the Approved Project was determined to result in the addition of traffic-related noise because it is not capacity-increasing. The Approved Project was determined to not result in increased ambient noise levels because the Project would not alter the nature and use of the existing site. Therefore, the Project would result in a less-than-significant impact on noise.</p> <p>Like the Approved Project, the Modified Project would limit construction to the allowable hours as provided by the City of Bradbury and City of Monrovia Municipal Codes. Therefore, the Modified Project would result in less-than-significant impacts, consistent with Approved IS/MND and no new impacts would occur.</p>
<p>Population and Housing</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impact to population and housing. The Modified Project would not include the removal or construction of housing on the site.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road. The Modified Project would result in no impact to population and housing, consistent with the Approved IS/MND.</p>
<p>Public Services</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impacts to public services. The Proposed Project would not require employees or implement residential uses on the site that would result in increased demand for public services, and therefore would not result in any impacts related to public services.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road and would not result in increased demand for public services. Therefore, the Modified Project would result in no impact, consistent with the Approved IS/MND.</p>
<p>Recreation</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impact to recreation because the Project would not consist of the development of any buildings that would increase the demand for parks.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road and would not result in increased demand for parks. Therefore, the Modified Project would result in no impact, consistent with the Approved IS/MND.</p>
<p>Transportation</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined that the Approved Project would result in less-than-significant impacts to transportation. The Modified Project would generate vehicular trips from construction workers traveling to and from the Project site, delivery of construction supplies and import material to, and export of debris from the Project site. However, these activities would only occur for approximately two months. Construction-related trips would be temporary and nominal due to the scope of the Modified Project. Temporary roadway closure of Bradbury Road may be required during some construction activities, including asphalt removal and replacement. Full roadway closure would be minimized to the least amount of time feasible. The City would coordinate any required roadway closures with emergency service providers in both the City of Bradbury and Monrovia (PPP HAZ-1). Therefore, impacts related to inadequate emergency access would be less than significant.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road. Transportation-related impacts during construction would be the same for the Modified Project. The Modified Project would result in less-than-significant impacts, consistent with the Approved IS/MND and no new impacts would occur.</p>

<p>Tribal Cultural Resources</p>	<p>Less Than Significant Impacts with Mitigation. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts to tribal cultural resources with implementation of mitigation. Tribal cultural resources were not identified within the Project site. However, the Project site is considered sensitive to tribal cultural resources due to historic occupation as ancestral tribal territory and could yield tribal cultural resources during Project construction. Mitigation Measures TCR-1 through TCR-3 were included in consultation with Gabrieleño Band of Mission Indians – Kizh Nation, during AB-52 consultation. With implementation of Mitigation Measures TCR-1 through TCR-3, a tribal monitor would be present during Project construction and specific processes would be followed in the event of an unanticipated discovery. Therefore, the Approved Project was determined to result in less-than-significant impacts with implementation of mitigation.</p> <p>Like the Approved Project, the Modified Project would require implementation of Mitigation Measures TCR-1 through TCR-3. No further AB 52 consultation is warranted as the Modified Project is on the same site and of similar scope as the Approved Project. Therefore, the Modified Project would result in less-than-significant impact with mitigation incorporated, consistent with the Approved IS/MND and no new impacts would occur.</p>
<p>Utilities/Service Systems</p>	<p>Less Than Significant Impacts. The Approved IS/MND determined the Approved Project would result in less-than-significant impacts to utilities and service systems. The Approved Project would not include the development of any buildings that would require water or wastewater infrastructure nor relocate any existing lines. The Approved Project would not include demolition of any existing buildings or produce waste from packaging of construction materials. Although the Project would not include the development of any buildings, there would be a minimal amount of water used during grading for soil compaction and dust control. Water usage would be temporary in nature and not have a significant impact on water supplies. Thus, impacts would be less than significant.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road. Impacts to utilities and service systems would be similar to the Approved Project. The Modified Project would result in less-than-significant impacts, consistent the Approved IS/MND and no new impacts would occur.</p>
<p>Wildfire</p>	<p>No Impacts. The Approved IS/MND determined the Approved Project would result in no impacts related to wildfire. According to the CAL FIRE Fire Hazard Severity Zones map, the Project site is not within a Very High Fire Hazard Zone. The Project does not include construction of housing, buildings, and infrastructure that would exacerbate fire risk. The Project would not generate slopes and would connect to existing drainage facilities. Thus, the Project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires.</p> <p>Like the Approved Project, the Modified Project would widen the existing Bradbury Road. The Modified Project would be in the same site and therefore, would have the same level of impact to wildfire as the Approved Project. Therefore, the Modified Project would result in no impact, consistent with the Approved IS/MND.</p>

The Modified Project would not result in further major modifications to the previously Approved Project. Therefore, Modified Project changes would not be anticipated to result in new or greater significant impacts beyond those identified in the previously adopted Approved IS/MND and overall Modified Project impacts would be less than significant after mitigation. The Modified Project would be required to comply with all applicable mitigation, local, State, and federal regulations and policies included in the approved environmental documentation.

7. APPLICABLE APPROVED IS/MND MITIGATION MEASURES

The Modified Project would implement the following mitigation measures from the Approved IS/MND. With implementation, all impacts would be less than significant. Therefore, the Modified Project would not introduce any new Project-specific mitigation measures.

Mitigation Measure BIO-1: Tree preservation and planting plan. City Planning Department and shall review, and the Planning Commission shall approve a tree preservation and planting plan which replaces native oak trees and prominent trees in accordance with Municipal Code Section 9.118.040, as follows:

- The City of Bradbury will replace all removed trees, final number to be determined (see Mitigation Measure BIO-5), at a 1:1 ratio with 15-gallon trees of the same species prior to project closeout;
- The Bradbury Estates will accommodate up to 16 replacement trees;
- The City of Bradbury and Bradbury Estates Homeowner's Association will be responsible, in partnership, for the maintenance of the trees in perpetuity once planted;
- The remaining replacement trees will be planted in the City of Duarte, at the Donald and Bernice Watson Recreation Trail, then to parks and medians, in that order of priority;
- The City of Bradbury will purchase and deliver trees to the City of Duarte, in which the City of Duarte will plant within (4) weeks of receipt;
- The City of Duarte will be responsible for the maintenance of the trees in perpetuity once planted.

Mitigation Measure BIO-2: Monitoring Plan. An ongoing maintenance and monitoring plan shall be approved and implemented by the City of Bradbury Planning Department for trees preserved onsite and for replacement trees, to ensure long-long term tree health, and to minimize tree failure.

- An International Society of Arboriculture (ISA) certified arborist shall monitor the replacement trees for a minimum of three years, to evaluate the growth, health, and condition of the replacement trees. Strategic pruning compliant with ISA standards must be performed to subordinate non-primary, codominant stems and canopy deadwood should be removed. Regular maintenance is recommended according to ISA standards.
- Perform inspection after road improvement are completed to determine if preserved oaks have crowns impacted by changed grade or hydrology onsite. Given the degree of the resident trees' inherent lean to the south and their potential to fall towards the roadway, the post-installation inspection must be performed and shall include a workplan for bracing (as needed) to mitigate potential tree failure.
- The arborist shall also monitor preserved trees for a period of three years after construction to assure survival of remaining trees.

Mitigation Measure BIO-3: Tree Protection during Construction. Construction plans shall include a note to require tree protection measures during construction, as follows:

1. Dripline fencing must be placed a minimum of 1 foot in radius from the tree per 1 inch of diameter at breast height (for example, 6-inch trunk = 6 feet protection radius/12 feet diameter).
2. Dripline fencing must be erected so that it is visible and structurally sound enough to deter construction equipment, foot traffic, and the storing of equipment under tree canopies.
3. Raising or lowering the grade in the root zone of trees can be fatal or ruin the health of trees for years to come. Grade change and soil compaction force out the oxygen and literally press the life out of the soil. A retaining wall can be used to minimize the amount of the root zone that is affected, but it is essential that the footing is not continuous. Gravel and aeration pipes should be placed inside the retaining wall before the fill is placed. Consult with a qualified civil engineer for proper design calculations.

4. Trenching within the protection zone must be avoided wherever possible. Most of the roots are in the top 1 to 2 feet of soil, and trenching can sever a large percentage of roots.
5. Oil from construction equipment, cement, concrete washout, acid washes, paint, and solvents are toxic to tree roots. Signs should be posted on the fencing around trees notifying contractors of the fines for dumping. Portable latrines that are washed out with strong detergents can damage the fine roots of the trees. Portable latrines should not be placed near trees, nor where frequent and regular foot traffic to them will compact the soil below the trees.
6. Construction creates large amounts of dust, and the oaks and any other trees to be preserved will need to be kept clean. Dust reduces photosynthesis on all trees. Strict dust control measures must be implemented during construction to minimize this impact, and an occasional rinsing with a solution of water and insecticidal soap will help control pests.

Mitigation Measures BIO-4: Nesting Birds. The following measures shall be implemented to mitigate potential impacts on nesting birds:

- Project ground disturbing and vegetation clearing activities should occur outside of the bird nesting season of February 1 through September 15;
- If avoidance of ground disturbing and vegetation clearing activities cannot be implemented and these activities will occur during the bird nesting season, a qualified biologist shall conduct pre-construction nesting bird survey during the nesting bird season within 3 days prior to vegetation removal and/or construction activities; and,
- If active nests are found during nesting bird surveys, they will be flagged and a 500-foot buffer for raptors and a 250-foot buffer for migratory song birds, shall be installed around the nests. The buffers must remain in place until the young have fledged and the nest becomes unoccupied.

Mitigation Measure BIO-5: Tree monitoring during construction. A qualified arborist with Tree Risk Assessment Qualification (TRAQ) and field experience with evaluation, maintenance, and care of Coast Live Oak (*Quercus agrifolia*) trees, will be retained by the City and present during initial ground distributing activities and site preparation activities. The arborist will determine whether individual trees, or root systems, impacted during construction would necessitate removal of the tree based on the health, risk of failure, and other potential issues that could occur as a result of the project. The arborist may direct the installation of bracing and/or guying measures, corrective pruning, or other treatment for the protection in-place of trees (including root systems impacted by the project. Trees originally considered for removal may be preserved with corrective measures if determined that preservation would not result in risk to public safety. Trees identified as potentially impacted during preliminary tree surveys will be subject to removal or preservation at the discretion of the arborist monitor during construction. Trees identified for removal would be subject to mitigation under Mitigation Measure BIO-1.

Mitigation Measure CUL-1: Inadvertent Discoveries. Prior to the issuance of any permitted ground disturbing activities that cause excavation of soils (including as grading, excavation, and trenching), the City of Bradbury shall ensure that all Project grading and construction plans and specifications shall state that in the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, the Native American Monitor shall evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources.

Mitigation Measure PAL-1: Paleontological Resources. Prior to issuance of a grading permit, the City of Bradbury shall verify that all Project grading and construction plans and specifications state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (i.e., a practicing paleontologist that is recognized in the paleontological community and is proficient in vertebrate paleontology) from the City or County List of Qualified Paleontologists has evaluated the find in accordance with federal and state regulations. Construction personnel shall not collect or move any paleontological materials and associated materials. If any fossil remains are discovered, the paleontologist shall make a recommendation if monitoring shall be required for the continuance of earth moving activities.

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

- A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.
- E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

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

- A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

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

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

- A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.
- B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
- C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
- D. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
- E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.
- F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six

months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

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

8. DETERMINATION

As set forth in State CEQA Guidelines Section 15164(b), an agency may prepare an addendum to a prior CEQA document: "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred."

This Addendum is the appropriate CEQA documentation for the Project because:

- The Project does not change the land use that was previously approved, the impacts of which were previously analyzed in the Final IS/MND for the project approved on December 13, 2022, by the City of Bradbury;
- The Project would not permit an intensification of uses that would lead to increased environmental impacts beyond those that are already analyzed in the Final IS/MND;
- The Project does not modify previously analyzed project in a substantive way;
- No new Project-specific mitigation measures are required;
- None of the conditions identified in Public Resources Code Section 21166 or Section 15162 of the CEQA Guidelines apply; and,
- No new significant adverse Project-specific or cumulative impacts in any environmental areas were identified, nor would any project-specific or cumulative impacts in any environmental areas be made worse as a result of implementing the Project.

Therefore, pursuant to State CEQA Guidelines Section 15164, this document serves as an Addendum to the Certified Final IS/MND prepared for the original Approved Project. It is the independent judgment of City of Bradbury that the proposed changes to the Modified Project do not require the preparation of a subsequent MND or EIR as described in State CEQA Guidelines Section 15162.

9. REFERENCES

- California Department of Conservation. (2022). *California Important Farmland Finder*. Accessed: April 2024. <https://maps.conservation.ca.gov/dlrp/ciff/>
- California Department of Conservation. (n.d.) *Earthquake Zones of Required Investigation*. Accessed: April 2024. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>
- CAL FIRE. (2024). *Fire Hazard Severity Zone Map*. Accessed: April 2024. <https://egis.fire.ca.gov/FHSZ/>
- City of Bradbury. (2014). *2012-2030 General Plan*.
<https://cms7.revize.com/revize/bradburyca/services/forms.php#outer-65>
- City of Bradbury. (2021). *City of Bradbury Municipal Code*.
https://library.municode.com/ca/bradbury/codes/code_of_ordinances?nodeId=COOR_TITIXDEC_O_PTVZODIALLAUS_CH73AGREESZODI_S9.73.020PEUS.
- City of Bradbury Engineer's Office. (2024). *Bradbury Road Widening Project Storm Water Runoff Impacts Memorandum. (Appendix A)*
- City of Monrovia. 2021. *City of Monrovia General Plan Land Use Element*.
<https://www.cityofmonrovia.org/home/showpublisheddocument/18995/637594394771270000>.
- Department of Toxic Substances Control. (2024). *EnviroStor Database*. Accessed: April 2024.
<https://www.envirostor.dtsc.ca.gov/public/>
- EPD Solutions. (2022). *Bradbury Road Widening Project Final Initial Study/Mitigated Negative Declaration*.

APPENDIX A: Stormwater Technical Memorandum

Memorandum

CITY OF BRADBURY

City Engineer's Office

DATE: April 16, 2024

TO: Kevin Kearney, City Manager

FROM: David Gilbertson, City Engineer

SUBJECT: Bradbury Road Widening Project Storm Water Runoff Impacts

Environmental

During the public comment period for the of Bradbury Road Widening Project's Initial Study and Mitigated Negative Declaration (IS/MND), a comment was brought forth from a Monrovia resident expressing concern of stormwater runoff in the proposed project area. The comment states that the stormwater runoff from the Estates, north of the intersection of Deodar Lane and Wild Rose Ave located on the northwesterly end of the project, floods onto the front yards of the properties on the south side of Wild Rose Ave during heavy rain.

The Final Mitigated Negative Declaration (MND) included Section 5 which provide a response to comments that were received during the public comment period. Response to Comment 4.1.6 specifically pertains to the stormwater comment, see below:

Section 10, Hydrology and Water Quality, threshold c) ii) of the IS/MND analyzes the Project's potential to increase the rate or amount of surface runoff that could result in flooding on- or off-site. As described in the IS/MND, the Project would result in a negligible increase in impervious surface area, and existing drainage would accommodate the Project's stormwater runoff. Therefore, the Project would result in a less than significant impact.

This memo is to maintain that the initial response to comment remains true with the proposed modifications to the plans initiated by the Settlement Agreement with Grow Monrovia. The proposed modifications to the plans include limiting widening of the pavement sections to only Bradbury Road and excluding it on Wild Rose Ave, which further minimizes the impervious areas.