APRIL 2023

205 East Valley Boulevard Project

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PUBLIC REVIEW DRAFT

Michael Baker
INTERNATIONAL

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205 East Valley Boulevard Project

Lead Agency:

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April 2023

JN 185256

This document is designed for double-sided printing to conserve natural resources.

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1.0 INTRODUCTION

The 205 East Valley Boulevard Project (herein referenced as the "project") proposes to construct a new 79,129-square foot building with 51 apartment units and approximately 10,542 square feet of commercial space on an approximately 0.69-acre site located at 205 East Valley Boulevard. The proposed project is discussed in detail in Section 2.0, *Project Description*. Following a preliminary review of the proposed project, the City of San Gabriel (City) has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Mitigated Negative Declaration addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA (Public Resources Code Sections 21000-21177) and pursuant to Section 15063 of Title 14 of the California Code of Regulations (CCR), the City of San Gabriel, acting in the capacity of Lead Agency, is required to undertake the preparation of an Initial Study to determine whether the proposed project would have a significant environmental impact. 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 proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration) for that project. 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 (Section 21080, Public Resources Code).

The environmental documentation, which is ultimately approved and/or certified by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon 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

Section 15063 of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- 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;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible 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

As soon as the Lead Agency (in this case, the City of San Gabriel) 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 on the environmental documentation to be prepared for the project. Following receipt of any written comments from those agencies, the City would consider their recommendations when formulating the preliminary findings. Following completion of this Initial Study, the City would initiate 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 utilized during preparation of this Initial Study and are incorporated into this document by reference. The documents are available for review at the City of San Gabriel Planning Division located at 425 South Mission Drive, San Gabriel, California 91776.

- *Comprehensive General Plan of the City of San Gabriel, California (adopted May 18, 2004)*. The *Comprehensive General Plan of the City of San Gabriel* (General Plan) provides a general, comprehensive, and long-range guide for community decision-making. The General Plan is organized into 11 elements: Land Use; Housing and Demographics; Mobility; Economic Development; Public and Environmental Safety; Community Facilities; Open Space and Recreation; Environmental Resources; Noise; Community Design; and Cultural Resources. Each General Plan element presents an overview of its scope, summary of conditions and planning issues, goals, targets and actions. Goals, targets, and actions of the General Plan are applicable to all lands within the City's jurisdiction. The General Plan was utilized throughout this document as the fundamental planning document governing development at the project site.
- *Environmental Evaluation for the Comprehensive General Plan of the City of San Gabriel, California (2004)*. The *Environmental Evaluation for the Comprehensive General Plan of the City of San Gabriel, California* (General Plan Environmental Evaluation) reviews the City's existing conditions and analyzes potential environmental impacts from implementation of the General Plan. The General Plan Environmental Evaluation consists of three parts: an Initial Study for evaluating potential environmental impacts of the General Plan Update; an environmental narrative to analyze the potential growth-inducing impacts of the General Plan Update; and an environmental determination in which the City recommends whether additional, more comprehensive, environmental review is needed. The General Plan Environmental Evaluation determined that because the General Plan Update would be within the boundaries and scope of analysis of the 1989 General Plan and EIR, and would impose stricter policies and standards, implementation of the General Plan Update would result in less than significant environmental impacts.
- *San Gabriel Municipal Code (current through Ordinance 684, passed September 6, 2022)*. The *San Gabriel Municipal Code* (Municipal Code) consists of regulatory, penal, and administrative ordinances of the City. It is the method the City uses to implement control of land uses, in accordance with General Plan goals and policies. Municipal Code Title XV, *Land Usage*, includes the City's Zoning Code and is intended to provide the economic and social advantages resulting from an orderly planned use of land resources and to conserve and promote the public health, safety, and general welfare of the City. The Zoning Code also establishes zoning districts and regulations for the use of land and development for properties within the City.
- *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan (adopted December 19, 2006, amended January 15, 2013)*. The *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan* (Valley Boulevard Specific Plan [Specific Plan]) provides a road map of land use development, building and site design, transportation, infrastructure, and streetscape strategies to develop within the Specific Plan area in a sustainable manner. The Specific Plan area has experienced substantial reinvestment and change during recent years and is anticipated to continue to do so for the future. As such, the Specific Plan provide a unique opportunity to re-think and re-direct investments in a manner that will achieve the Specific Plan's sustainability objectives and enhance community livability.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of San Gabriel (City) is located in the San Gabriel Valley of Los Angeles County, approximately 11 miles northeast of the downtown Los Angeles area; refer to Exhibit 2-1, *Regional Vicinity*. The City is approximately 4.09 square miles. Surrounding jurisdictions include the cities of San Marino and Temple City to the north, Temple City and unincorporated County of Los Angeles to the east, Rosemead to the east and south, and Alhambra to the west.

The proposed 205 East Valley Boulevard Project (project) is located on an approximately 0.69-acre L-shaped site, which consists of two parcels (Assessor's Parcel Numbers [APNs] 5369-018-002 and 5369-018-020); refer to Exhibit 2-2, *Site Vicinity*. Regional access to the project site is provided via the San Bernardino Freeway (Interstate 10 [I-10]). Local access to the project site is provided via East Valley Boulevard and South Del Mar Avenue.

2.2 ENVIRONMENTAL SETTING

The project site is currently developed as an asphalt-paved surface parking lot. The property owner periodically rents the site to third parties for temporary event use. Two storage containers are also located in northern portion of the site. The site has an access driveway along East Valley Boulevard and one along South Palm Avenue. Currently, the site is fenced off on all sides, including the adjoining parcel to the southeast. On-site topography is relatively flat averaging approximately 335 feet above mean sea level and gently slopes to the south-southeast. Ornamental trees, low-lying shrubs, and weeds are scattered throughout the site. One lamppost is located at the center of the site at approximately the intersection point of the horizontal and vertical legs of the L-shaped site.

GENERAL PLAN LAND USE DESIGNATION AND ZONING

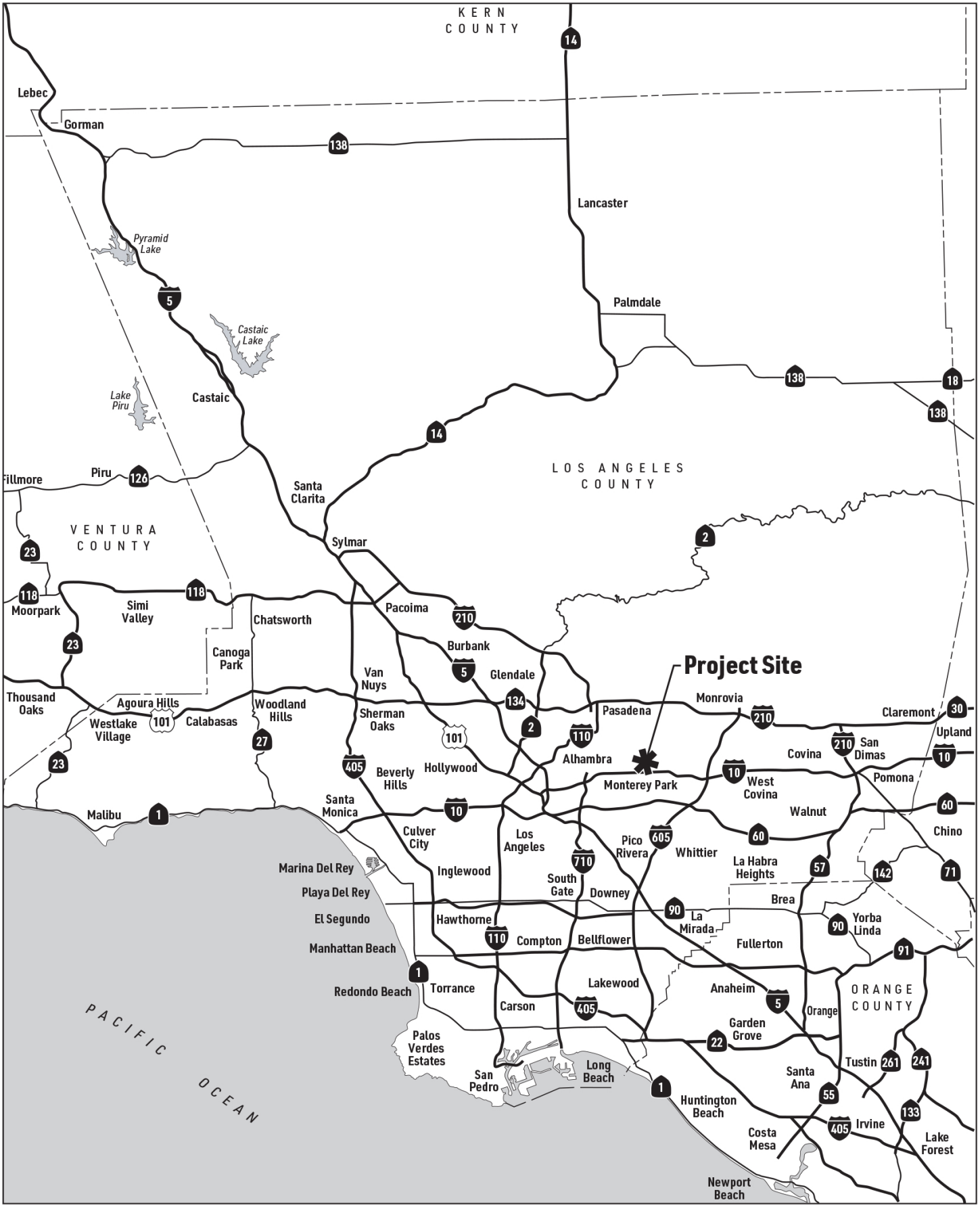
Based on *The Comprehensive General Plan of the City of San Gabriel, California* (General Plan), the *City of San Gabriel Zoning Map* (Zoning Map), and the *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan* (Valley Boulevard Specific Plan [Specific Plan]), the project site is designated Commercial Specific Plan and located within the Valley Boulevard Specific Plan area. According to the General Plan, the Commercial Specific Plan designation applies to two areas within the City, which each have a distinct character and for which special land use and development strategies are needed to capitalize on the special advantages inherent in each of these areas. As such, land use and development standards for the project site are established in the Valley Boulevard Specific Plan.

According to the Zoning Map and Specific Plan, the project site is zoned Mixed-Use Transit Oriented Development (MU-T). The MU-T zone is intended to allow for a wide variety of uses, including retail, office, residential, public and service, hotel, and live/work units that support the principals for sustainable development (i.e., transit-oriented development) along East Valley Boulevard.

SURROUNDING USES

Surrounding land uses include a mixture of transportation, residential, and commercial uses. Specific uses surrounding the project site include:

- *North:* Multi-family residences are located to the north of the project site. These uses are designated High Density Residential and zoned Multiple Family Residence (R-3). Areas further north of the project site include single-family residences and are designated Medium Density Residential and zoned Low Density Multiple Family Residence (R-2).



205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Regional Vicinity

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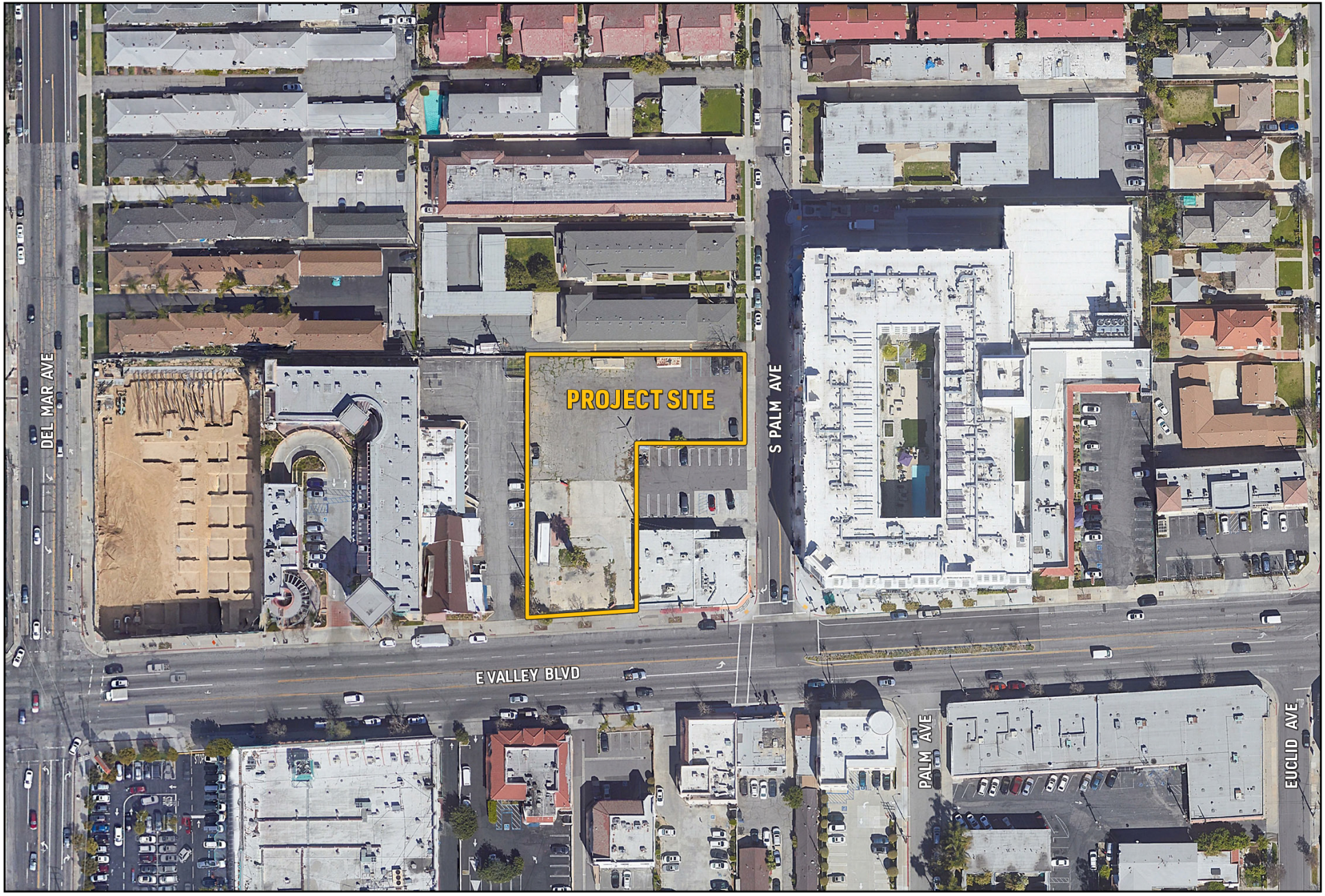
Exhibit 2-1



Source: Google Earth Pro, August 2021

205 EAST VALLEY BOULEVARD PROJECT
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Site Vicinity

Exhibit 2-2

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- *East:* South Palm Avenue bounds the project site to the east. Commercial uses including the Sheraton hotel and several restaurant and retail stores are located east of South Palm Avenue in an area designated Commercial Specific Plan and zoned MU-T.

- *South:* East Valley Boulevard bounds the project site to the south. A parcel located to the southeast of the site (surrounded by the L-shaped project site to its north and west) is developed with a single-story commercial structure occupied by SCIC (a mailing service company) and former Floral Restaurant. Areas further south of East Valley Boulevard include single- and two-story commercial buildings (i.e., Beijing Tasty House, Skylink, Saigon Flavor, SmokePlug, E Z Vehicle Registration & Insurance, and Sai Fong Ginseng & Herb Inc., among others) and are designated Commercial Specific Plan and zoned MU-T.

- *West*: Areas to the west of the project site include institutional uses (i.e., The Salvation Army San Gabriel Center of Worship and Service) and commercial uses (i.e., Fortune Court shopping center) and are designated Commercial Specific Plan and zoned MU-T.

2.3 BACKGROUND AND HISTORY

The project site has supported residential and commercial uses as early as the 1940s. The project site was originally developed with residences until the early 1950s. A commercial building and associated surface parking lot were developed in the southwestern portion of the site in the early 1960s (with its foundation currently present on-site). Sardis Italian Cuisine operated at this location from the early 1960s; subsequently, Nam's Cantonese Cuisine occupied the site from the late 1960s to the early 1990s. All structures have been demolished since the early 1990s. The site remains paved since this time and has been predominantly vacant with periodic use by third parties for temporary events.

2.4 PROJECT CHARACTERISTICS

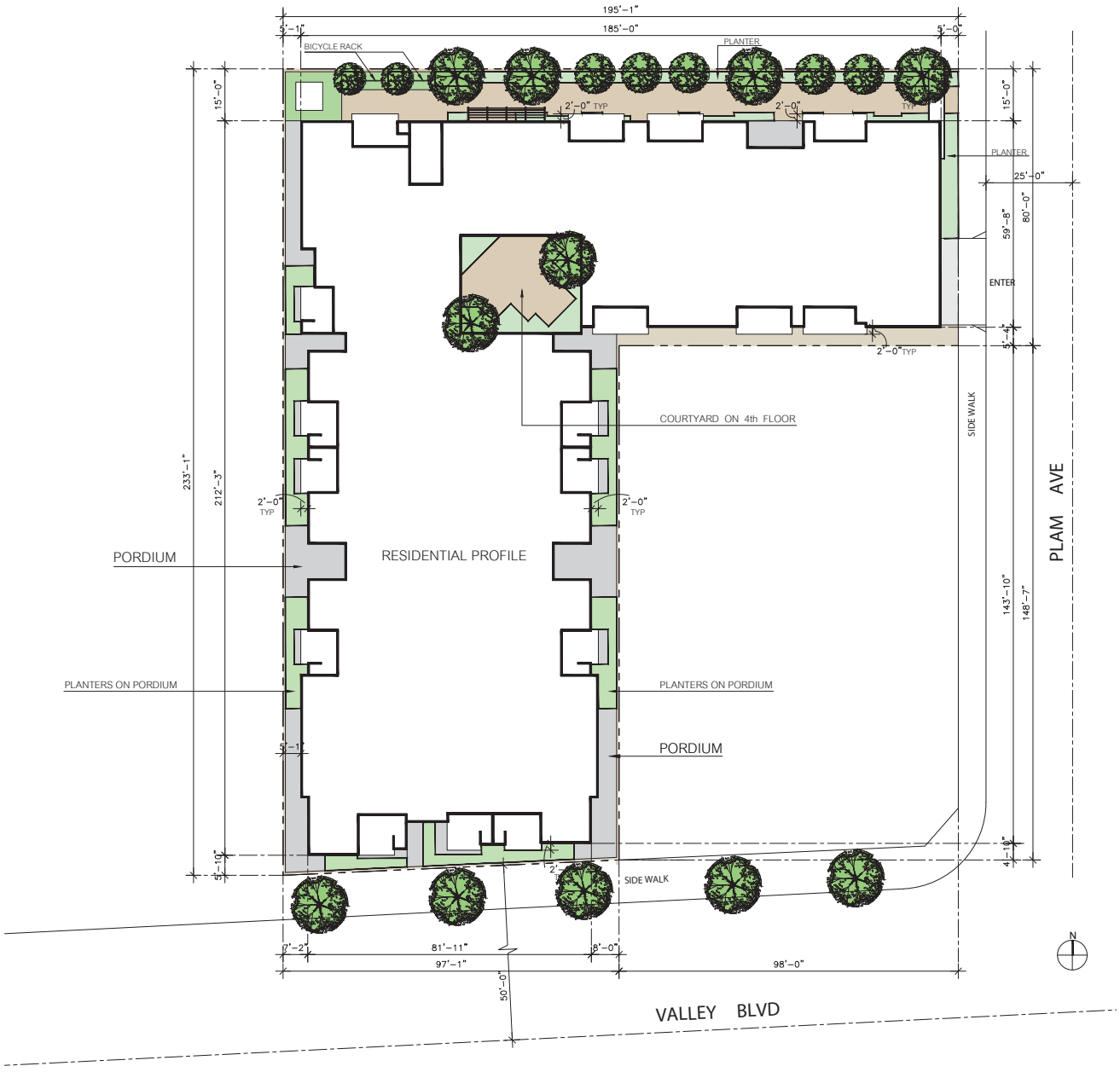
The project proposes to demolish existing pads and construct a four-story, 79,129-square foot mixed-use building. The proposed building would consist of 51 apartment units, approximately 10,542 square feet of ground-level commercial use, and two levels of subterranean parking; refer to Exhibit 2-3, *Conceptual Site Plan*.

Conceptual floor plans for each level of the building are illustrated on Exhibits 2-4a, *Floor Plan – P2 Basement Garage* through Exhibit 2-4g, *Floor Plan – Roof*. The residential portion of the project would consist of one- to two-bedroom units ranging in size from 755 to 1,126 gross square feet. The one- to two-bedroom units would occupy the second through fourth floors, with 17 units of varying sizes on each floor. Each residential floor would also include a small lobby and community room with the exception of the fourth floor, which would have a landscaped courtyard in place of the community room.

The ground-level commercial uses would provide approximately 10,542 square feet for general commercial/office use, of which 1,800 square feet may be allocated for a coffee shop along East Valley Boulevard. The commercial component of the project is anticipated to be open seven days a week from 9:00 a.m. to 10:00 p.m. Valet parking would be provided for commercial use patrons. Approximately one to two daytime truck deliveries would occur per month.

ARCHITECTURE

The proposed building architecture is contemporary with exterior building materials consisting of exterior plaster, cement wall panel, steel wall liner, stone screen panel, trendstone ground face masonry unit, aluminum door frame, translucent tempered and fiber glass, and concrete, among others. The building exterior would include a combination



Source: The Architect Group, December 2022

205 EAST VALLEY BOULEVARD PROJECT
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Conceptual Site Plan

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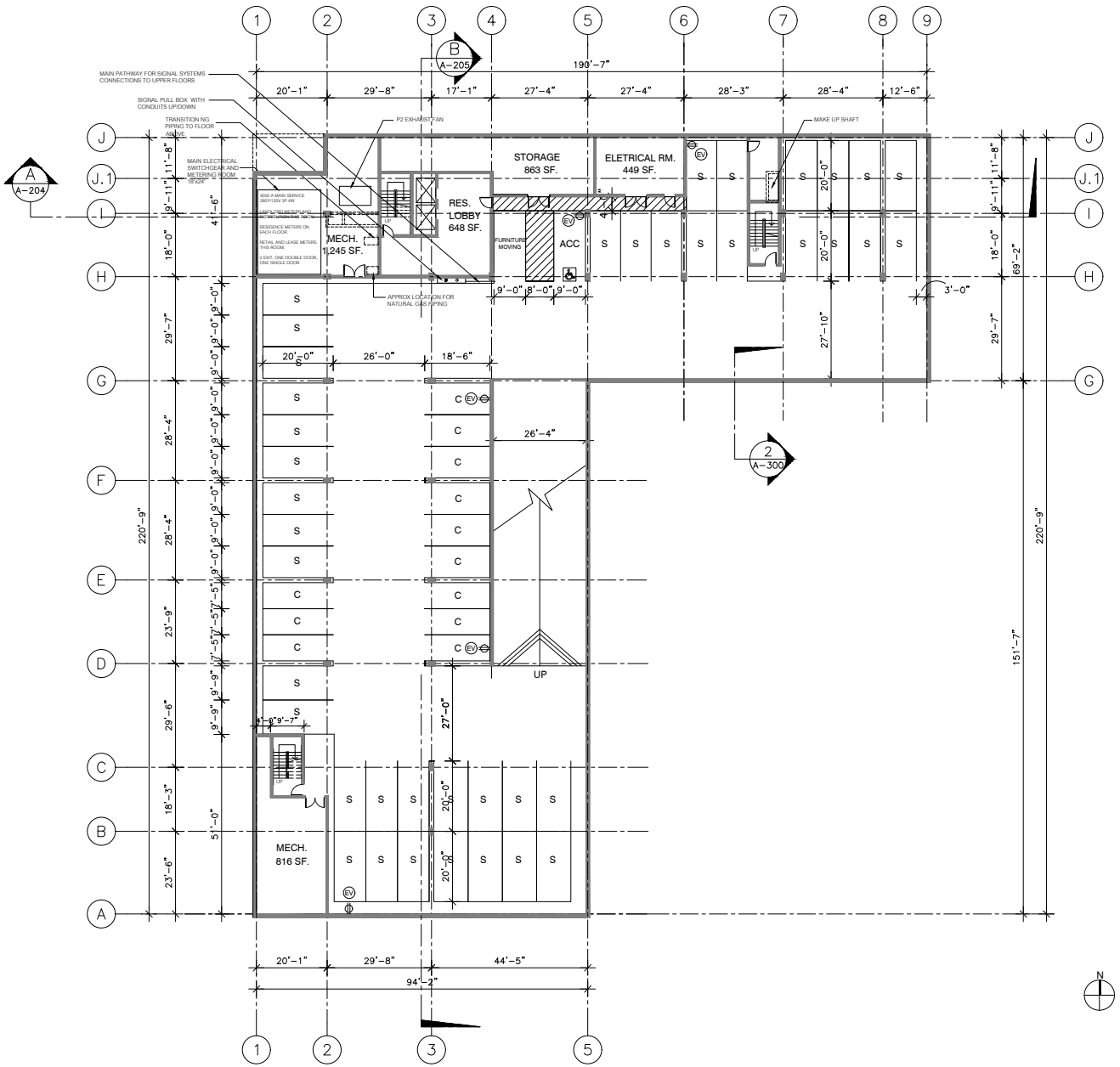
Exhibit 2-3



Source: The Architect Group, December 2022

205 EAST VALLEY BOULEVARD PROJECT
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Floor Plan – P2 Basement Garage

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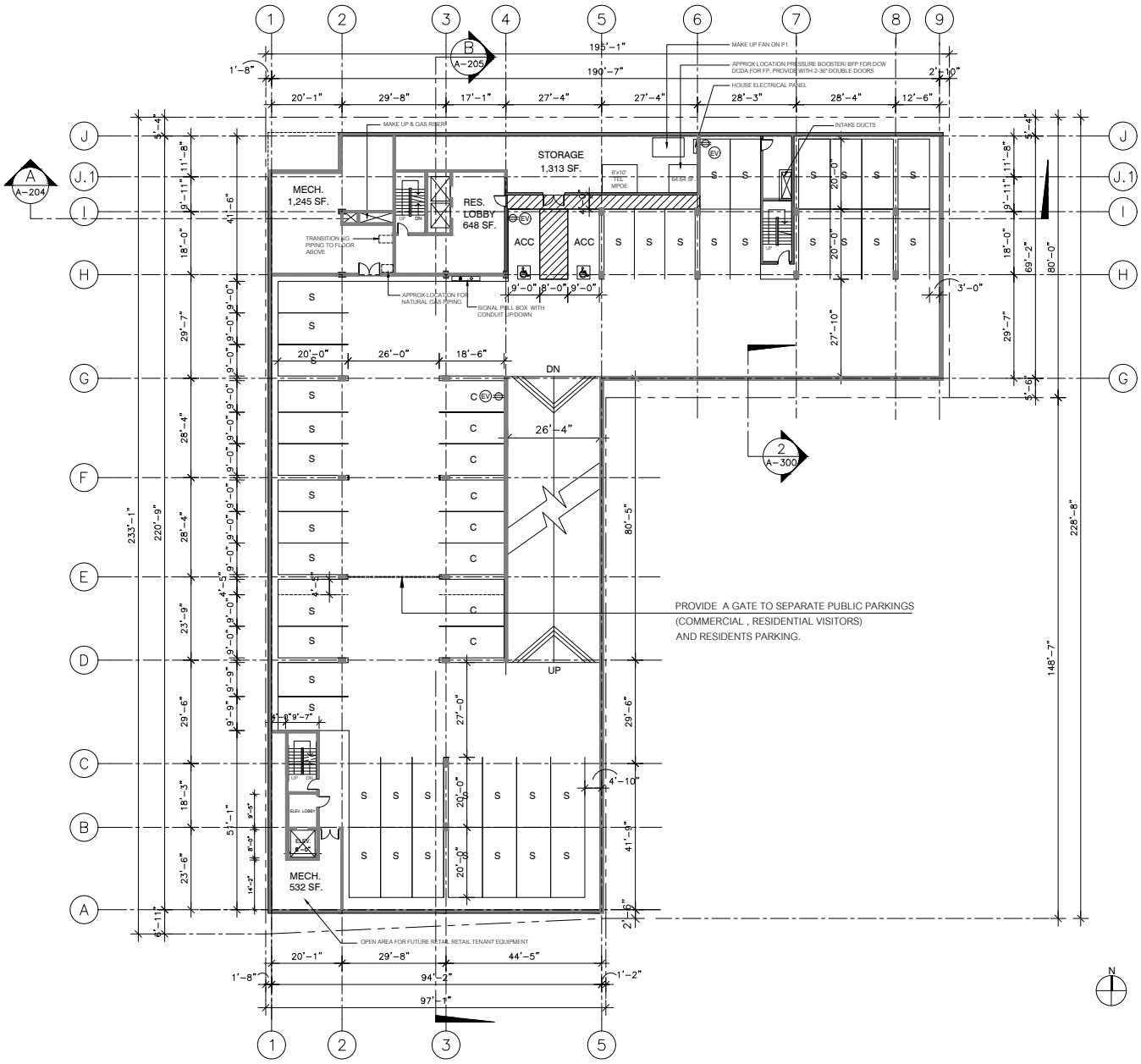
Exhibit 2-4a



Source: The Architect Group, December 2022

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205 EAST VALLEY BOULEVARD PROJECT
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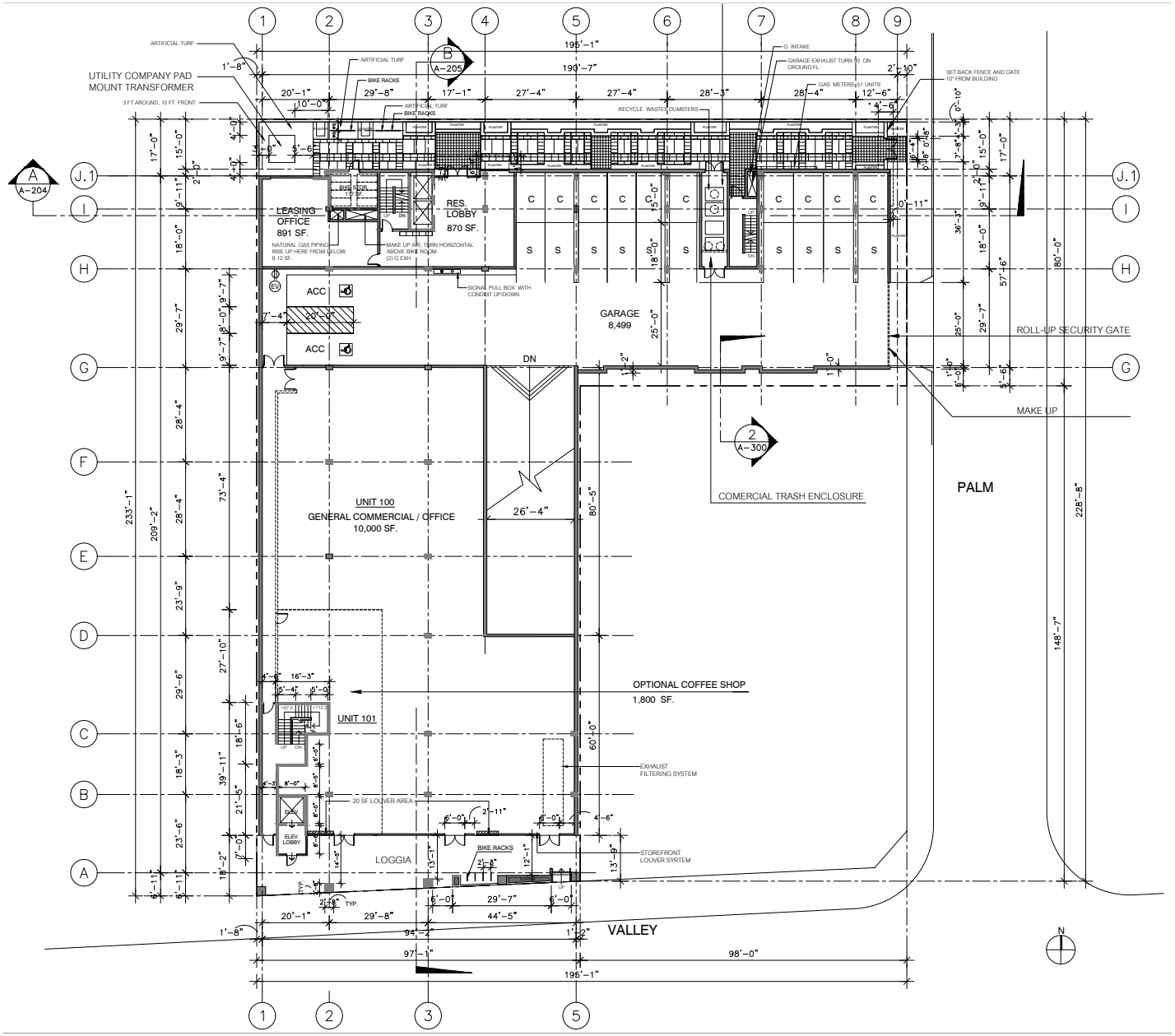
Floor Plan – P1 Basement Garage

Exhibit 2-4b



Source: The Architect Group, December 2022

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205 EAST VALLEY BOULEVARD PROJECT
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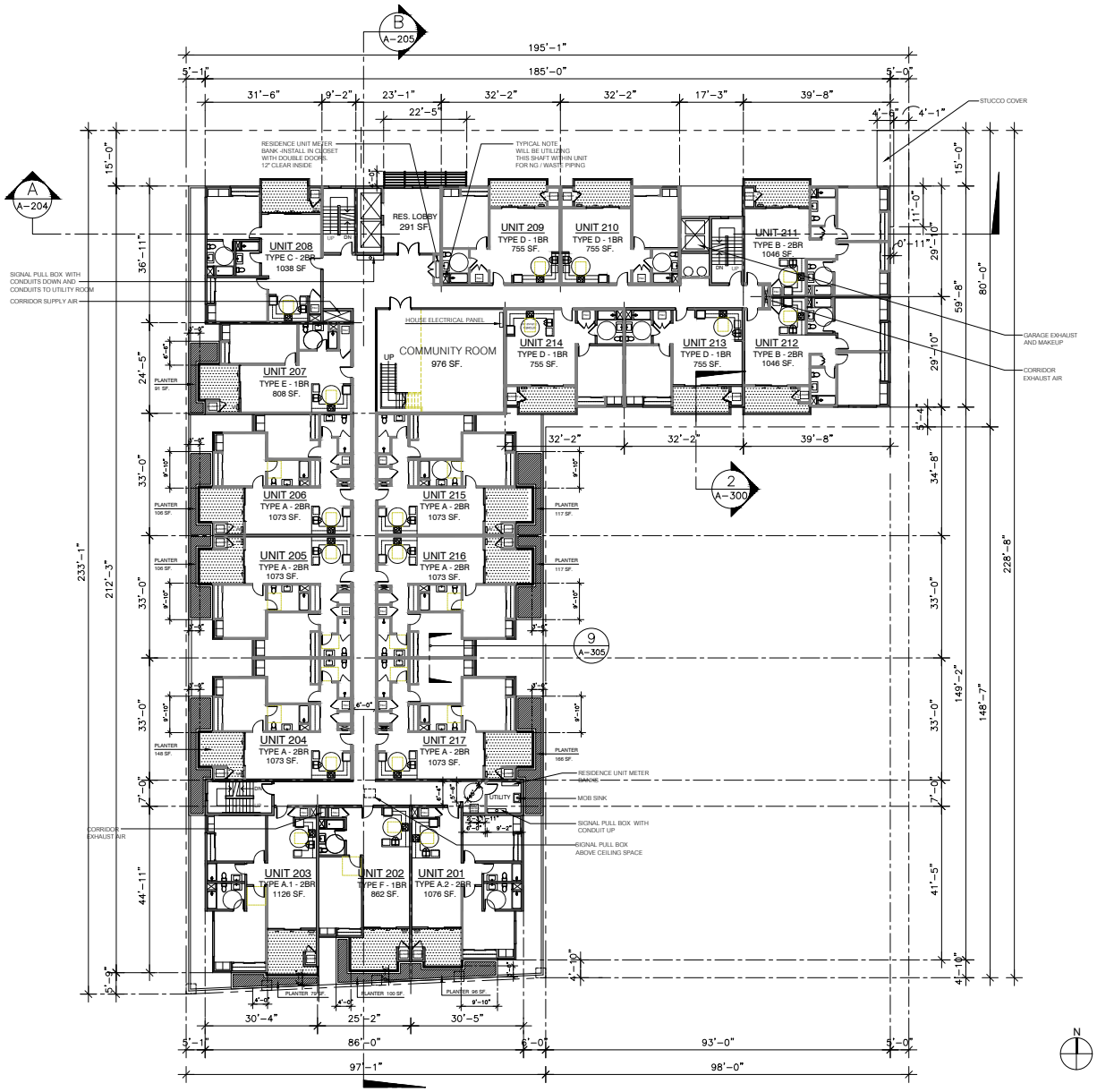
Floor Plan – Ground Floor

Exhibit 2-4c



Source: The Architect Group, December 2022

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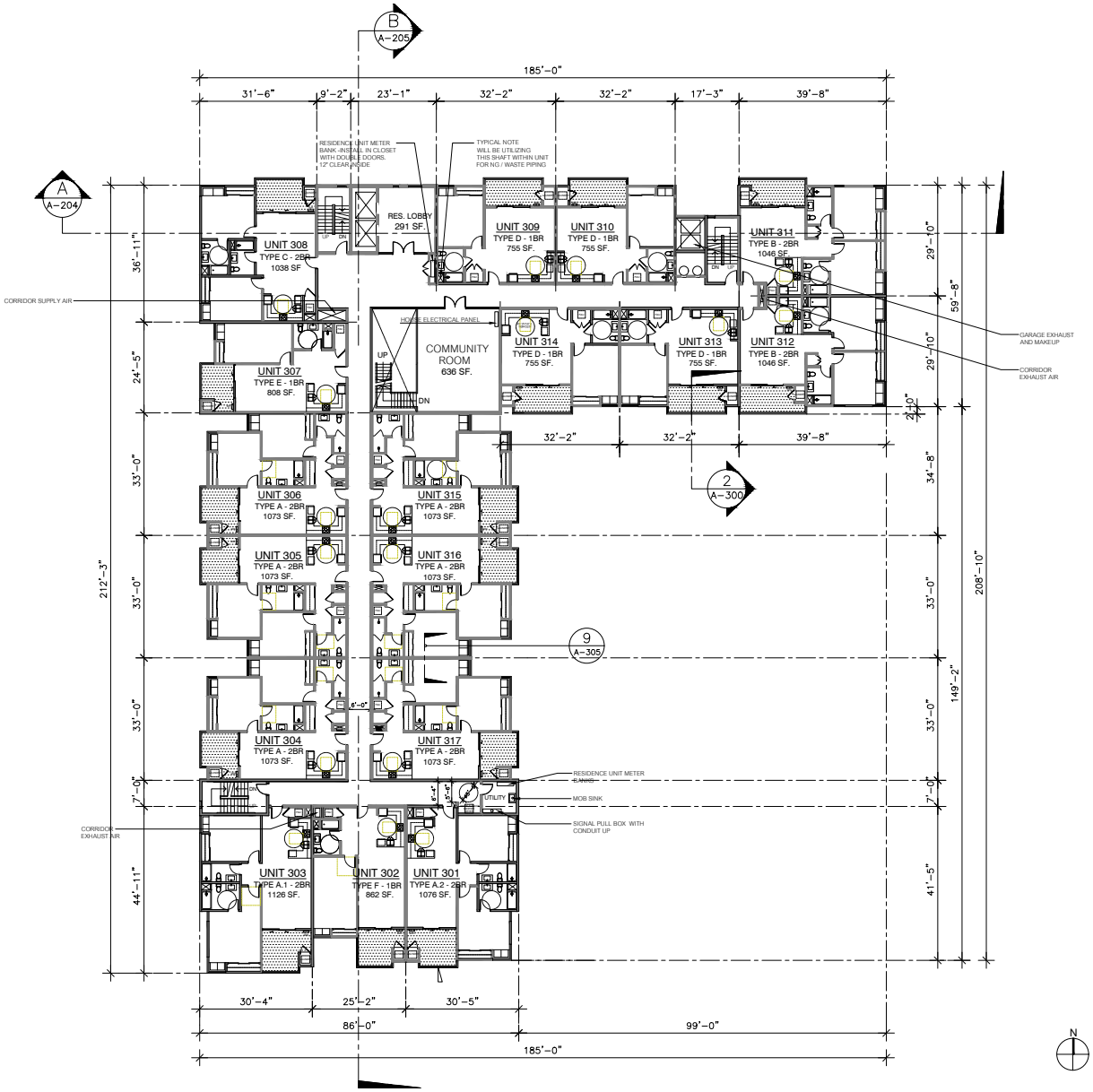
205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Floor Plan – Second Floor

Exhibit 2-4d



Source: The Architect Group, December 2022

205 EAST VALLEY BOULEVARD PROJECT
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Floor Plan – Third Floor

Exhibit 2-4e

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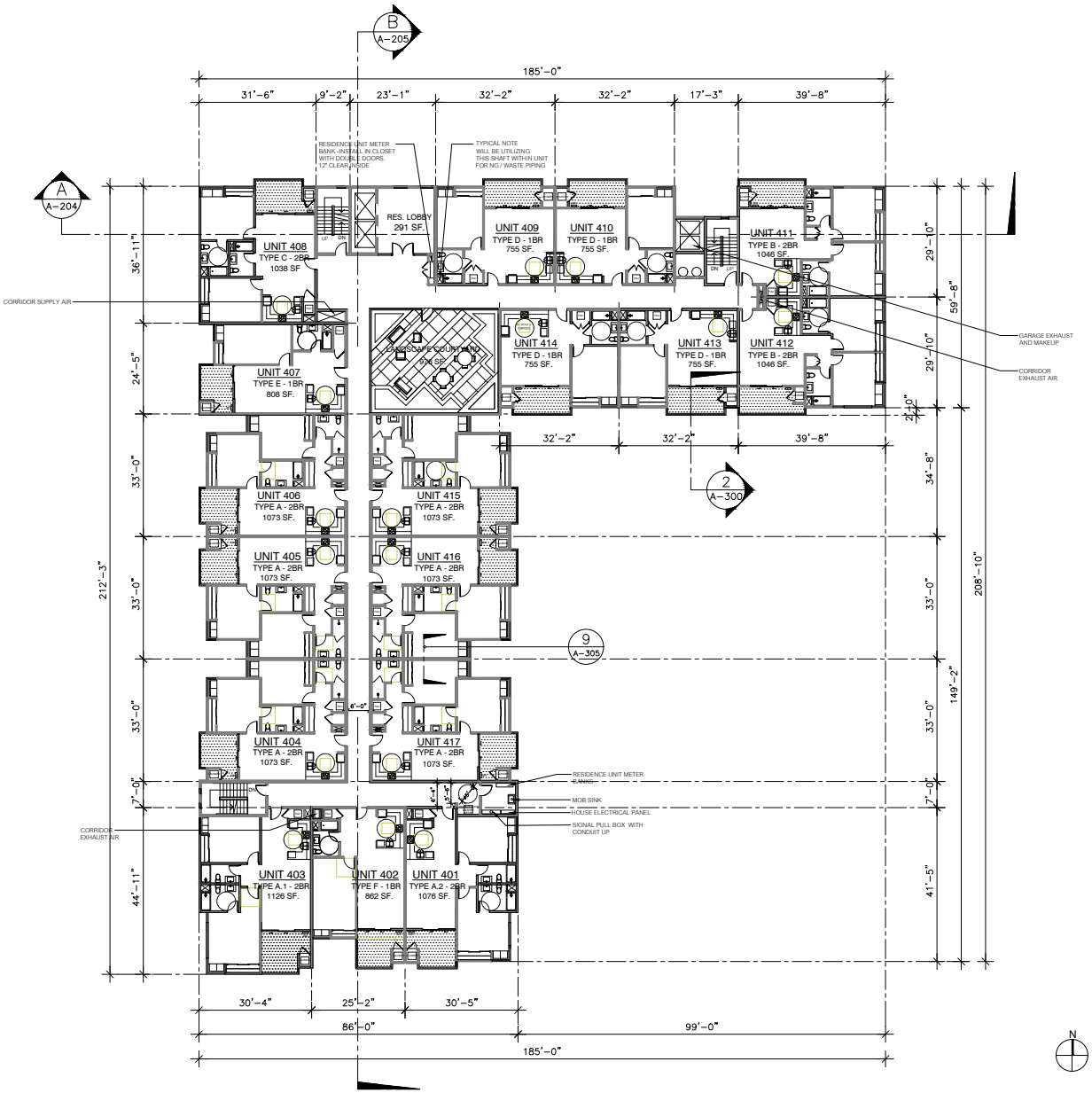

Source: The Architect Group, December 2022

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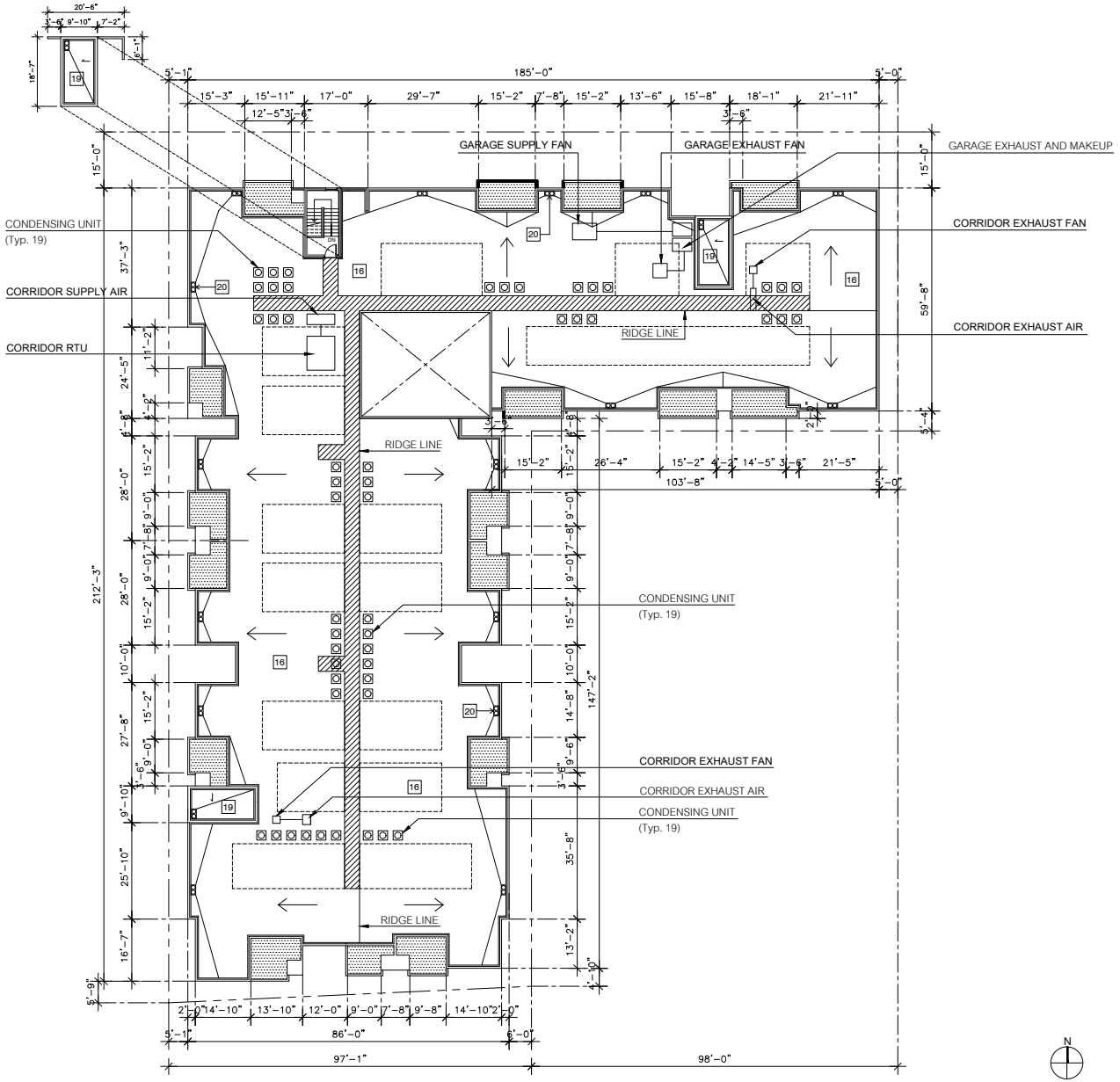
205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Floor Plan – Fourth Floor

Exhibit 2-4f



Source: The Architect Group, December 2022

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Floor Plan – Roof

Exhibit 2-4g

of colors including gray, blue, white, bronze, and light brown. Overall, the building would have a maximum height of 59 feet.

Project frontage along East Valley Boulevard would include a loggia/courtyard (Main Entrance Courtyard), as well as floor-to-ceiling exterior ground level windows and signage to highlight the entrance to the commercial space. The residential lobby and leasing office located in the northwest corner of the site would also feature floor-to-ceiling exterior windows. Decorative lighting fixtures and raised concrete planters would be installed throughout the mixed-use development.

SITE ACCESS AND PARKING

The project would provide a total of 128 parking spaces consisting of 42 public parking spaces for residential guests and patrons and employees of the commercial uses and 86 private (residential) spaces. Twenty-two spaces would be provided on the ground level with two subterranean parking levels each providing 53 spaces. Parking spaces would consist of a mixture of standard (56 spaces), compact (30 spaces), tandem (36 spaces), accessible (5 spaces), and furniture moving/unloading spaces (one space). Additionally, two accessible and six standard spaces would be equipped with electric vehicle chargers. Entrance to the ground level and subterranean parking garage would be provided via a security roll-up gate along South Palm Avenue; refer to Exhibit 2-3.

A bicycle storage room with an eight-bicycle capacity would be located by the residential lobby and leasing office in the northwestern corner of the site. Two short-term bicycle racks would also be provided near the commercial uses along East Valley Boulevard (five bicycle spaces) and parking entrance along South Palm Avenue (nine bicycle spaces).

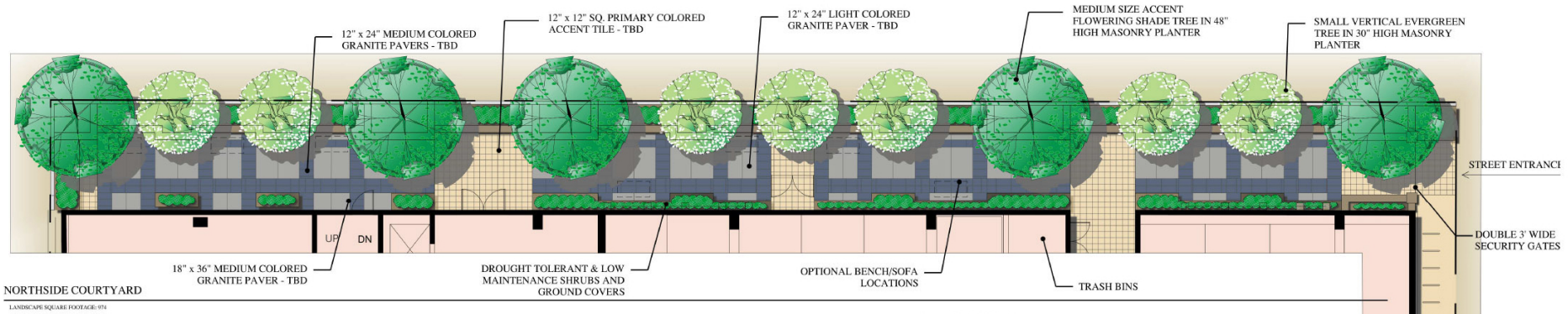
Pedestrian access to the proposed commercial component of the site would be provided along existing sidewalks along East Valley Boulevard, while access to the apartments would be primarily provided via a gated courtyard (i.e., Northside Courtyard) along the northern perimeter of the site; refer to Exhibit 2-4c. It is also noted that an existing bus stop for Metro Bus Route 76 is located approximately 300 feet west of the site on East Valley Boulevard.

AMENITIES AND OPEN SPACE

Common open space is proposed on the ground level in the Main Entrance Courtyard and Northside Courtyard and on the fourth floor courtyard; refer to Exhibit 2-5a, *Conceptual Landscape Plan – Courtyard*. The two landscaped courtyards on the ground level would include trees, planters with drought-tolerant grasses, shrubs and groundcover, and bicycle racks. Granite pavers, colored accent tiles, and trash bins would also be installed within the courtyards. The courtyard on the fourth floor would include landscaped planters with shrubs and groundcover, trees, outdoor tables and chairs/sofas, two outdoor natural gas barbecue units and porcelain tiled pavers; refer to Exhibit 2-5b, *Conceptual Landscape Plan – Second and Fourth Floors*.

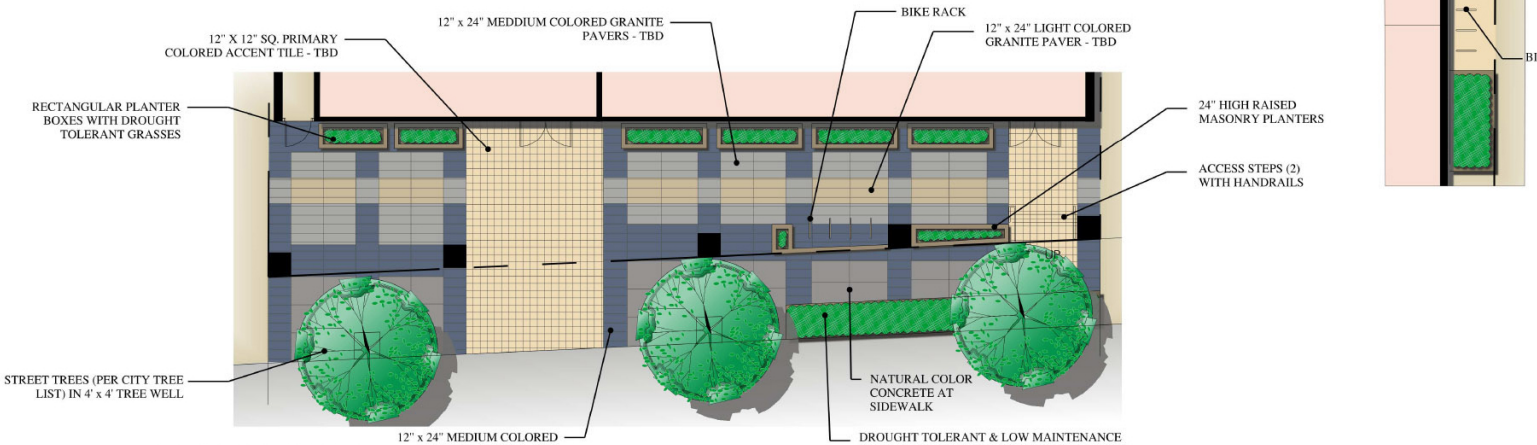
Additionally, the project would provide several residential amenities, including a lobby, community rooms on the second and third floors, and the previously described landscaped courtyard on the fourth floor. Additionally, private open space (e.g., patios and/or balconies) is provided for each residential unit. In total, the project would provide approximately 5,471 square feet of common open space and 6,306 square feet of private open space.

The proposed mixed-use development would include a solar-ready roof that would generate approximately 315,300-kilowatt hours per year. Additionally, energy-efficient appliances would be installed throughout the development.



NORTHSIDE COURTYARD

LANDSCAPE SQUARE FOOTAGE: 974



MAIN ENTRANCE COURTYARD

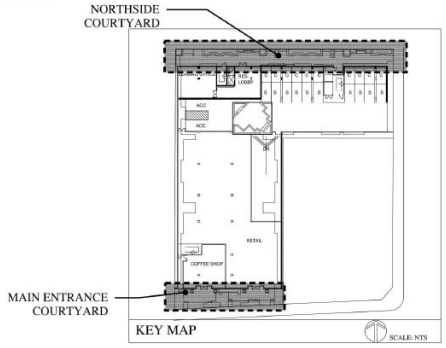
LANDSCAPE SQUARE FOOTAGE: 70

PLANTING LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WUCOLS
	TREES:				
	PYRUS CALLERYANA CULTIVARS	CALLERY PEAR	24" BOX	-	MOD
	PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	-	MOD
	PHOENIX ROEBELINII	PIGMY DATE PALM	18" BTH	-	MOD
	SHRUBS:				
	ACHILLEA MILLEFOLIUM	RED VELVET YARROW	5 GAL	QTY	LOW
	BOUGAINVILLEA SPP.	DWARF BOUGAINVILLEA	5 GAL	QTY	LOW
	CISTUS PURPUREUS	ORCHID ROCKROSE	5 GAL	QTY	LOW
	DUDLEYA PULVERULENTA	CHALK LIVEFOREVER	6 GAL	QTY	LOW
	LAVANDULA ANGUSTIFOLIA	ENGLISH LAVENDER	5 GAL	QTY	LOW
	MIMULUS (DIPLACUS) AURANTIACUS	BUSH MONKEYFLOWER	5 GAL	QTY	LOW
	NANDINA DOMESTICA	HEAVENLY BAMBOO 'COMPACTA'	5 GAL	QTY	LOW
	PHORMIUM TENAX	NEW ZEALAND FLAX	5 GAL	QTY	LOW
	ROMNEYA COULTERI	MATILIJA POPPY	5 GAL	QTY	LOW
	RHUS INTEGRIFOLIA	LEMONADE BERRY	5 GAL	QTY	LOW
	GROUNDCOVERS:				
	MYOPORUM PARVIFOLIUM	MYOPORUM		-	LOW
	VINES:				
	MACFADYENA UNGUIS-CATI	CAT'S CLAW VINE		-	LOW

IRRIGATION & PLANTING NOTES:

1. ALL LANDSCAPE AREAS SHALL RECEIVE A WATER CONSCIOUS AUTOMATIC IRRIGATION SYSTEM. DRIP IRRIGATION SHALL BE UTILIZED WHERE EVER APPROPRIATE.
2. ALL ON - SITE PLANTING AND IRRIGATION SHALL BE MAINTAINED TO ENSURE WATER EFFICIENCY AND HEALTH APPEARANCE.
3. ALL UNSIGHTLY SITE APPARATUS SHALL BE SCREENED WITH 5 GALLON SHRUBS OR GREATER (BACK FLOW PREVENTERS, TRANSFORMERS, GAS METERS, AC UNITS ETC.)
4. THE CRITERIA OF CALIFORNIA MODEL WATER EFFICIENT LANDSCAPE ORDINANCE WILL BE CALCULATED & PROVIDED TO ASSURE COMPLIANCE OF EFFICIENT USE OF WATER WITHIN THE NEW DESIGNED LANDSCAPE PLAN



COURTYARDS

Source: Segura Associates, Inc., February 2021

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205 EAST VALLEY BOULEVARD PROJECT
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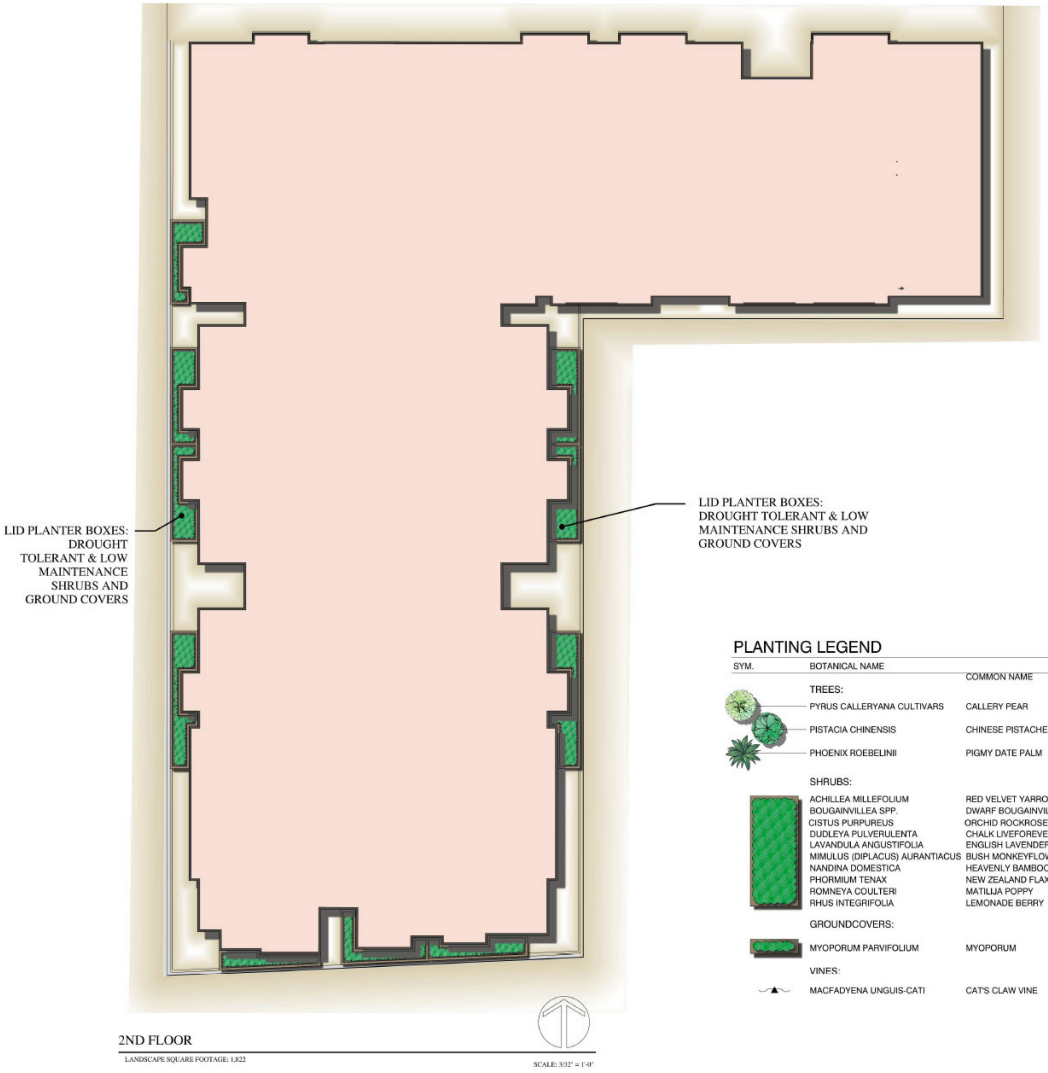
Conceptual Landscape Plan – Courtyard

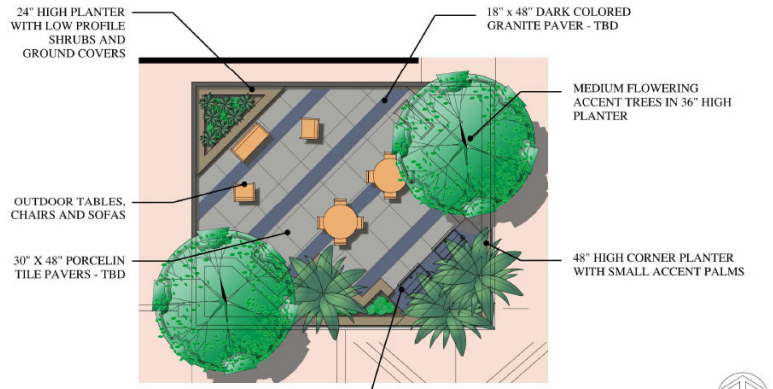
Exhibit 2-5a



2ND FLOOR

LANDSCAPE SQUARE FOOTAGE: 1,822

SCALE: 3/32" = 1'-0"



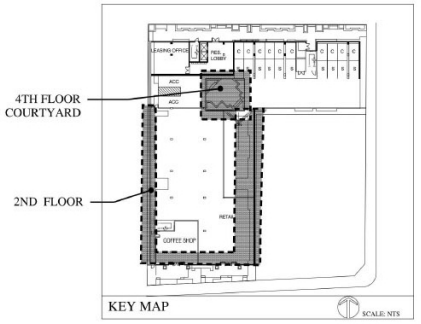
4TH FLOOR COURTYARD

LANDSCAPE SQUARE FOOTAGE: 178

SCALE: 3/16" = 1'-0"

PLANTING LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WUCOLS
	TREES:				
	PYRUS CALLERYANA CULTIVARS	CALLERY PEAR	24" BOX	-	MOD
	PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	-	MOD
	PHOENIX ROEBELINII	PIGMY DATE PALM	18" BTH	-	MOD
	SHRUBS:				
	ACHILLEA MILLEFOLIUM	RED VELVET YARROW	5 GAL	QTY	LOW
	BOUGAINVILLEA SPP.	DWARF BOUGAINVILLEA	5 GAL	QTY	LOW
	CISTUS PURPUREUS	ORCHID ROCKROSE	5 GAL	QTY	LOW
	DUDLEYA PULVERULENTA	CHALK LIVEFOREVER	5 GAL	QTY	LOW
	LAVANDULA ANGUSTIFOLIA	ENGLISH LAVENDER	5 GAL	QTY	LOW
	MIMULUS (DIPLACUS) AURANTIACUS	BUSH MONKEYFLOWER	5 GAL	QTY	LOW
	NANDINA DOMESTICA	HEAVENLY BAMBOO 'COMPACTA'	5 GAL	QTY	LOW
	PHORMIUM TENAX	NEW ZEALAND FLAX	5 GAL	QTY	LOW
	ROMNEYA COULTERI	MATILIJA POPPY	5 GAL	QTY	LOW
	RHUS INTEGRIFOLIA	LEMONADE BERRY	5 GAL	QTY	LOW
	GROUNDCOVERS:				
	MYOPORUM PARVIFOLIUM	MYOPORUM		-	LOW
	VINES:				
	MACFADYENA UNGUIS-CATI	CAT'S CLAW VINE		-	LOW



2ND & 4TH FLOORS

Source: Segura Associates, Inc., February 2021

Michael Baker INTERNATIONAL

NOT TO SCALE

08/2021 JN 185256

205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Conceptual Landscape Plan – Second and Fourth Floors

Exhibit 2-5b

LANDSCAPING

Ornamental landscaping would be planted throughout the project site, particularly in the ground-level Main Entrance Courtyard and Northside Courtyard, along the perimeter of the second floor, and on the fourth floor courtyard; refer to Exhibit 2-5a, and Exhibit 2-5b. Planting materials may feature drought-tolerant plants that include a mix of trees, shrubs, vines, and groundcover, all of which would be contained in raised planters or Low Impact Development (LID) planter boxes. Tree varieties may include Callery pear, Chinese pistache, and pigmy date palm. Shrubs and perennial landscaping may include red velvet yarrow, dwarf bougainvillea, orchid rockrose, chalk liveforever, English lavender, bush monkeyflower, heavenly bamboo, New Zealand flax, Matilija poppy, and lemonade berry. Groundcover and vine may include myoporum and cat's claw vine. Further, lighting is proposed along the Northside Courtyard (primary for security and landscaped lighting along the pedestrian walkway) and would be shielded by proposed accent trees to prevent off-site illumination.

UTILITIES AND SERVICES

The following utilities and services would serve the project site:

- *Water*. The San Gabriel County Water District (SGCWD) would provide water services to the project site. Private domestic, commercial, irrigation, and fire lines would be constructed on-site to connect to existing water facilities in East Valley Boulevard. It is acknowledged that the project would feature water-efficient irrigation systems.

- *Wastewater*. The City of San Gabriel Public Works Department owns and maintains the City's sewer system network and the Sanitation Districts of Los Angeles County (LACSD) provides wastewater treatment services. Sewer collection pipelines are proposed on-site to connect to existing sewer pipelines in East Valley Boulevard.

- *Drainage*. Currently, on-site runoff sheet flows southeasterly towards South Palm Avenue and East Valley Boulevard. The project proposes on-site drain inlets around the project perimeter. Collected runoff would be conveyed to various LID biofiltration planter boxes. Filtered runoff from the biofiltration planter boxes would be discharged through curb drains along the face of the adjacent sidewalks. Flows in excess of the capacity of the biofiltration planter boxes would be collected in atrium drains and discharged through curb drains along South Palm Avenue.

- *Dry Utilities*. Southern California Edison (SCE) and Southern California Gas Company (SoCalGas) would provide electricity and natural gas services to the project site, respectively. AT&T and Charter Spectrum would provide telecommunication services to the proposed project. New private electricity, natural gas, and telecommunication lines would be constructed on-site. All new facilities would be installed underground.

2.5 PHASING AND CONSTRUCTION

Project construction would occur in a single phase over a duration of approximately 24 months. Construction of the project would include demolition, grading, building construction, and architectural coating. The proposed earthwork would involve approximately 26,000 cubic yards of cut and approximately 2,000 cubic yards of fill. Approximately 24,000 cubic yards of soil export would be required.

2.6 PERMITS AND APPROVALS

The City of San Gabriel is the Lead Agency for the project and has discretionary authority over the project proposal, which includes the following:

- Adoption of the Initial Study/Mitigated Negative Declaration;
- Lot Line Adjustment (to merge the two parcels [APNs 5369-018-002 and 5369-018-020] into one parcel);
- Precise Plan of Design (to review the project site plan and architectural design);
- Master Sign Plan (to review the project master sign program and public art program); and
- Issuance of Applicable Grading and Building Permits.

In addition, the following permits/approvals may be required of other agencies:

- National Pollutant Discharge Elimination System (NPDES) Construction General Permit – Los Angeles Regional Water Quality Control Board.

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3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1. **Project Title:**
   205 East Valley Boulevard Project

2. **Lead Agency Name and Address:**
   City of San Gabriel, 425 South Mission Drive, San Gabriel, California 91776

3. **Contact Person and Phone Number:**
   Anthony Alvarado, Associate Planner, 626.308.2806

4. **Project Location:**
   The proposed 0.69-acre site is located at 205 East Valley Boulevard in the City of San Gabriel (Assessor's Parcel Numbers [APN] 5369-018-002 and 5369-018-020).

5. **Project Sponsor's Name and Address:**
   Valley SG Landplus, LLC, 135 East Live Oak Avenue, Arcadia, California 91006

6. **General Plan Designation:**
   The project site is designated Commercial Specific Plan.

7. **Zoning:**
   The project site is zoned Mixed-Use Transit Oriented Development (MU-T) by the *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan*.

8. **Description of Project:**
   The project proposes to demolish existing pads and construct a four-story, 79,129-square foot mixed-use building. The proposed building would consist of 51 apartment units, approximately 10,542 square feet of ground-level commercial use, and two levels of subterranean parking. Project approval would require a Precise Plan of Design, Lot Line Adjustment, Master Sign Plan, Grading and Building Permits, and CEQA Clearance.

9. **Surrounding Land Uses and Setting:**
   Surrounding land uses include a mixture of transportation, residential, and commercial uses; refer to Section 2.2, *Environmental Setting*.

10. **Other public agencies whose approval is required:**
    Other public agency approvals may include approval of a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the Los Angeles Regional Water Quality Control Board.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**
    In compliance with Assembly Bill 52, the City distributed letters to applicable Native American tribes informing them of the project on August 23, 2021. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation on September 2, 2021 and the City consulted with the tribe on October 21, 2021. Refer to Section 4.18, *Tribal Cultural Resources*, for additional information.

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" or "Less Than Significant Impact with Mitigation Incorporated," as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry	☐	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

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas 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 of San Gabriel 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 development would not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The development would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.

- *Less Than Significant Impact With Mitigation Incorporated*. The development would have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- *Potentially Significant Impact*. The development would have 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 would be required, so that impacts may be avoided or reduced to insignificant levels.

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4.0 ENVIRONMENTAL ANALYSIS

4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

The shade/shadow analysis contained herein is based in part on the *205 East Valley Boulevard Project Shade/Shadow Study* (Shade/Shadow Study), prepared by Michael Baker International, dated October 2021; refer to Appendix A, *Shade/Shadow Study*.

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

No Impact. The project site is in a highly urbanized area of San Gabriel and is surrounded by residential and commercial uses. According to the General Plan Environmental Evaluation, there are no designated scenic vistas in the City of San Gabriel. Thus, project implementation would have no impact on a scenic vista.

***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 officially designated State scenic highways in the City of San Gabriel.[1] The closest officially designated, or eligible, State scenic highway is Interstate 210 (Foothill Freeway), located over five miles to the northwest of the project site. The project site is not visible from Interstate 210 due to distance, intervening topography, structures, and vegetation. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

[1] California Department of Transportation, *List of Eligible and Officially Designated State Scenic Highways*, updated July 2019.

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; refer to Exhibit 2-2, *Site Vicinity*. Thus, for the purposes of this threshold, consideration of if the project would conflict with applicable zoning or other regulations governing scenic quality is made.

The project site is located in the *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan* (Valley Boulevard Specific Plan [Specific Plan]) and zoned Mixed-Use Transit Oriented Development (MU-T). The Specific Plan includes various land use, design and development, streetscape, and transportation and circulation development standards that aid in governing scenic quality. Table 4.1-1, *Specific Plan Development Standards Governing Scenic Quality Consistency Analysis*, provides a consistency analysis of the proposed project and relevant Specific Plan development standards . Refer also to Table 4.11-3, *Mixed-Use Transit Oriented (MU-T) Zone Development Standards Consistency Analysis*, for a discussion concerning the project's consistency with other applicable MU-T zone requirements.

Table 4.1-1
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
Design and Development Chapter – B. Mixed-Use Buildings	
B.1 Site Design	
Orientation 1. Buildings shall be located in order to reinforce continuous public street spaces. 2. Active frontages with doors, windows, and public arcades shall face the street and the sidewalk. 3. Buildings shall not be angled or rotated in relationship to existing street walls.	1. The proposed commercial uses of the mixed-use building would front East Valley Boulevard with an approximately 13- to 18-foot setback and a loggia, which would complement the existing public street space along the project frontage. Along South Palm Avenue, a five-foot setback would encourage continuous public street space while fulfilling its function as a parking ingress/egress point for the proposed building. 2. Ground-level commercial uses and a loggia are proposed along East Valley Boulevard. The commercial uses would have entry doors and large glass windows. 3. The proposed building is not angled or rotated and would be perpendicular to East Valley Boulevard. There are no existing street walls in the immediate vicinity of the project site.
Parking & Access 1. Parking shall be enclosed and finished in a manner similar to the remainder of the building. 2. No surface parking that is directly visible from the street is allowed (for screening methods see Section E.1 in this chapter). 3. Driveways are allowed; limited to 2 curb cuts; 3 if separate residential entrance is required. Maximum driveway width shall be consistent with the existing Zoning Code. 4. Vehicular entrances that are visible from the street shall include architectural detailing.	1. The proposed project would provide ground level and two levels of subterranean parking within an enclosed parking area with an entry/exit along South Palm Avenue. The enclosed parking area would be constructed of similar building material and finish as the remainder of the mixed-use building (e.g., exterior plaster cement wall panels and steel wall liners). 2. Ground level parking would be enclosed within the mixed-use building and thus, would be screened from public view. 3. As stated in response to Parking & Access (1), an entry/exit driveway would be located along South Palm Avenue. The parking driveway design would be consistent with the existing standards.

Table 4.1-1 [cont'd]
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
5. Drive-through establishments are not allowed. 6. Parking facilities shall be located below grade or behind building or tenant space, except for street frontage devoted to vehicular access, drop off, or valet parking. 7. Street level access to parking and loading facilities shall be located a minimum of 40 feet away from a primary building entrance or public outdoor gathering area. 8. Service, trash enclosures, and loading facilities must be blocked from view from public streets, open spaces, and other sensitive uses. 9. Loading shall only be allowed during day hours (7:00 a.m.–7:00 p.m.) 10. If there is over 15,000 sq feet of retail space, separate residential and commercial trash facilities are required. 11. Trash enclosures shall be designed in a manner that is consistent with the main building structure.	4. Refer to response to Parking & Access (1) and (2). 5. No drive-through uses are proposed by the project. 6. Refer to response to Parking & Access B.1(1). Proposed parking on-site would be located behind the building. 7. Street level access to parking on-site from South Palm Avenue would be greater than 40 feet from the primary building entrance along East Valley Boulevard and the proposed Main Entrance and Northside Courtyards. 8. Residential and commercial trash enclosures would be installed within the enclosed parking structure and screened from public view, the proposed on-site courtyards, and other sensitive uses in the area (e.g., off-site residences to the north). 9. The commercial uses on-site are anticipated to be open seven days a week from 9:00 a.m. to 10:00 p.m., with one to two daytime truck deliveries a month. As such, loading activities would be consistent with allowed daytime hours. 10. The project proposes approximately 10,542 square feet of ground-level commercial use. 11. Refer to response to Parking & Access (8).
B.2 Building Mass	
Massing 1. Buildings with first floor façades that are 50 feet or longer shall be subdivided into shorter segments. This must be done through one or more of the following techniques: a. Façade segmentation through recessed or projected façade elements every 25 feet b. Changes in window/façade composition c. Changes in wall materials 2. Individual storefronts shall be 30 feet in length; larger storefronts shall be divided so that an implied storefront change occurs every 30 feet. 3. Second floor facades shall not extend greater than 100 lineal feet without some manner of articulation. This must be done through one or more of the following techniques: a. Façade segmentation through recessed or projected façade elements every 50 feet b. Changes in roof form and/or height c. Changes in window/balcony/facade composition d. Changes in wall materials	1. The proposed project's first floor facades would be longer than 50 feet. However, the facades would be constructed with various building materials, including smooth finish (La Habra stucco) exterior plaster cement wall panels of different colors (black, brown, and grey), steel wall liners, metal painted rails, and tempered fiber glass, which provide an assortment of changes in window/façade composition and wall materials. Additionally, a loggia and Main Entrance Courtyard are proposed along the street frontage to provide a public open space area. 2. The commercial storefronts along East Valley Boulevard would be divided by stone screen panels to indicate storefront changes and distinguish each commercial storefronts individual entrance. 3. The building's second floor façade would extend approximately 90 feet along East Valley Boulevard and would include façade segmentation through recessed and projected façade elements, changes in windows and balcony composition, and changes building materials.

Table 4.1-1 [cont'd]
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
B.3 Building Entrances	
Main Entrances 1. The main entrance of a building shall be at the front façade of the building, oriented towards the public street. 2. Main entrances to new or remodeled buildings shall be disabled accessible according to current accessibility requirements on Title 24 and ADA. 3. Entrances may be located at corners if the building sits on a corner lot or is adjacent to a surface parking lot serving said building. 4. Main entrances shall be prominent and easily identifiable. 5. Each entrance shall have an architectural definition, such as an awning, recessed niche, 3-dimensional feature, or building projection. 6. A defined front door for the residential component is required.	1. The main entrance to the proposed project would be located at the front façade of the building along East Valley Boulevard. 2. Proposed development would be required to comply with existing accessibility requirements per Title 24 and ADA. 3. Refer to response to Main Entrances (1). Residential entrance to the building is provided in the northeast corner of the site near the Northside Courtyard. 4. The main building entrance would include prominent signs, including an aluminum storefront system with clear tempered glass to distinguish the building's primary entrance. 5. Refer to response to Massing (2). 6. Residential entrance to the building is provided in the northeast corner of the site near the Northside Courtyard, which would also feature a residential lobby and leasing office.
Rear Entrances 1. Public rear entrances shall be visible and easily located. 2. Rear entrances shall not be more prominent or larger than the front, primary entrance.	1. The project does not propose any public rear entrances. 2. Refer to response to Rear Entrances (1).
Shelter & Shade 1. Shelter shall be provided by façade recess, awning, or canopy. 2. Awnings are required to be permanent and shall use materials consistent with overall building design.	1. Refer to responses to Orientation (1) and (2). 2. Refer to responses to Orientation (1) and (2).
B.4 Open Space	
1. A minimum of 10 percent of the net lot area shall be provided as landscaped common open space for the residential and commercial portions of the building at ground level. Common open spaces shall be designed as plazas, courtyards, and/or other public open space (see landscape standards, Section E). Setback areas shall not be considered to satisfy this requirement. 2. A total of 10 percent or more of every residential unit floor area must be provided as private open space in the form of balconies or terraces. 3. To achieve sunlight in open areas and courtyards, the following minimum height to width ratios are required: 1 to 1 along at least one south or west elevation and 1 to 2 ratio along at least one elevation if the space is open on one or more sides.	1. Approximately 3,026 square feet of common open space is required (10 percent of the 30,267-square foot site). The project would provide 5,471 square feet of common open space in the various courtyards and loggia. 2. Approximately 4,938 square feet of private open space is required. The project would provide private open space (e.g., balconies) encompassing approximately 6,306 square feet. 3. Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's open space design standards.

Table 4.1-1 [cont'd]
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
B.5 Façade Composition	
Overall Façade Design 1. New façade design shall observe features of adjacent buildings in order to create visual consistency. 2. Buildings shall maintain architectural articulation and visual quality on all visible sides of buildings. 3. Large projects shall be broken into a series of appropriately scaled buildings or one building with a series of façade modulations that make the building appear as a series of different buildings.	1. The proposed façade design on the mixed-use building would complement building features of adjacent buildings, including the Sheraton hotel to the east. Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's overall facade design standards. 2. Refer to response to Massing (1). 3. Refer to response to Massing (1).
Building Base/Ground Floor Treatment 1. Buildings shall create a consistent urban street wall defining the street edge, defined as the façade of a building's podium/ground floor level that faces the street. 2. Breaks in the street wall shall be limited to those necessary to accommodate pedestrian pass-throughs and permitted vehicular access to driveways and drop-offs. 3. Buildings shall include a base treatment that establishes human scale for pedestrians. 4. One base treatment shall occur within 6 feet of height from the ground. 5. Design components of base features shall include one or more of the following: a. A thicker base portion of the ground floor. b. A material or color change c. A cornice line/protruding horizontal band. d. A ground-level columned arcade. e. A ground floor minor recess.	1. Refer to responses to Orientation (1), and Massing (1) and (2). 2. Refer to responses to Orientation (1), and Massing (1) and (2). 3. Refer to responses to Orientation (1), and Massing (1) and (2). 4. Refer to responses to Orientation (1), and Massing (1) and (2). 5. The Main Entrance Courtyard located at the main entrance of the building would include light and medium colored granite pavers, along with primary colored accent tiles and access steps with handrails.
Walls 1. A mixture of order and variety in window and door opening composition is required, with unifying elements. 2. Upper story window to wall ratios shall be lower than the ground floor. 3. Pilasters, cornices, or other surface treatments shall be added to add scale. 4. A change in material/color, cornices or some other horizontal element shall be used at the top of the ground level on front facades in order to differentiate ground-level storefronts from the upper levels.	1. Refer to responses to Massing (1) and Main Entrances (4). 2. Ground-level uses would have large glass windows while upper story windows would be smaller for residential privacy. 3. Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's wall standards. 4. The commercial uses would project outward closer to the street frontage compared to the upper levels of the building, which would differentiate ground-level storefronts from the upper residential levels.

Table 4.1-1 [cont'd]
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
Windows 1. Windows on first floor shall encompass: a. Retail uses: a minimum of 50 percent and a maximum of 70 percent of the building façade b. Office uses: a minimum of 40 percent and a maximum of 50 percent of the building facade 2. Shaped window frames and sill shall be used and must be proportional to the window framed 3. Curtain wall window treatments are permitted	Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's overall window design standards.
Wall Surface Materials 1. Ground-level detail is required in a manner consistent with the San Gabriel Design Guidelines. 2. Materials shall unify building appearance and also allow for expression of individual tenants. 3. The palette of wall materials shall be minimized; preferably two or less. 4. Stucco, cement plaster, or stucco like finishes are acceptable base material finishes. Stucco shall have a smooth finish, such as smooth trowel or fine sand float finish, or dash, rather than a textured, lace, or rough sand finish. 5. The following are acceptable accent materials: Wood siding, ceramic tile, stone or stone veener, brick, precast concrete, poured in-place concrete, concrete block, and corrugated or other sheet/rolled metal. 6. For wood siding, painted wood, hardiplank siding or fabricated vinyl is required.	1. Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's overall wall surface materials design standards. 2. Refer to response to Massing (1). 3. Refer to response to Massing (1). 4. Refer to response to Massing (1). 5. Refer to response to Massing (1). 6. The project does not propose to utilize wood siding on the proposed building.
B.6 Roof Forms	
1. Variation of roof forms and profiles is required. 2. Roof type selection shall be made with recognition of neighborhood context and adjacent building forms. 3. Roofs shall match the building in terms of style, detailing, and materials. 4. Roof overhangs are required when compatible with the architectural style. 5. Required roof materials include metal seam roofing, corrugated metal roofing, terra cotta or concrete tile, and tar and gravel (flat roofs only).	Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's roof form design standards.

Table 4.1-1 [cont'd]
Specific Plan Development Standards Governing Scenic Quality Consistency Analysis

Relevant Specific Plan Development Standards	Consistency Analysis
6. Roof mounted equipment shall be screened by architectural enclosures that relate to the building's overall architectural expression. 7. Roof drainage components shall be incorporated into the overall architectural composition of the façade and roof.	
B.7 Awnings, Trellises, and Canopies	
1. Fabric awnings, when used, shall be made of colored fabric over a metal structural frame. Internally illuminated fabric awnings are not allowed. 2. Forms of trellises and canopies shall be derived from the overall architectural style of the building. 3. Awnings, trellises and canopies shall be a minimum of 8 feet above grade. 4. Awnings, trellises and canopies shall be located between storefront windows and store signage. Awnings shall be located below store signage.	Subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's awnings, trellises, and canopy design standards.
B.8 Colors	
1. Colors shall accentuate architectural details of a building and be consistent with its style. 2. Three building colors shall be used to distinguish the main body of a building, its trim and accents. 3. Sign colors shall relate to building color. 4. Colors shall be consistent with architectural character of San Gabriel. 5. Color for trim, awnings, and other highlights shall accent and contrast with wall colors. 6. Use of bright colors is not allowed, except when used only sparingly.	Refer to response to Massing (1). Additionally, subsequent to the environmental review process, final site plan and architectural plans would be submitted for City review as part of the Precise Plan of Design process. Final project plans would be required to comply with the Specific Plan's color design standards.
B.9 Signage	
1. The commercial/retail portion of mixed-use buildings shall establish a master sign plan in accordance with the signage standards prescribed under the retail/commercial signage standards, Section A.9 in this chapter. 2. The residential portion of mixed-use buildings shall be required to follow the multifamily residential signage standards prescribed under the multi-family signage standards, (see Section C.9 in this chapter).	A Master Sign Plan would be established as part of the project to comply with the Specific Plan's signage design standards.

Source: City of San Gabriel, *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan*, adopted December 19, 2006, amended January 15, 2013.

As indicated in Table 4.1-1, the proposed project would be consistent with applicable Specific Plan development standards that govern scenic quality. Further, the project would be subject to the City's Precise Plan of Design review process, which would review the project's final site plan and architectural designs to ensure compliance with applicable City standards. This regulatory procedure would enforce the City's regulations governing scenic quality for the project site and surrounding area. As a result, implementation of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant in this regard.

SHADE/SHADOW ANALYSIS

Shading refers to the effect of shadows cast upon adjacent areas by proposed structures. Consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadow effects are dependent upon several factors, including the local topography, the height and bulk of the project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely usable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. Shadow-sensitive uses in the vicinity of the project site include the balcony and courtyard areas of adjacent uses (where sunlight is important for physical comfort of these uses).

In order to identify the proposed project's potential shadow-related impacts, existing and project-generated morning (9:00 a.m.), noon (12:00 p.m.), afternoon (3:00 p.m.), and evening (6:00 p.m.) shade patterns were compared for each of the four seasons; refer to Appendix A. The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. Therefore, the following four dates were used for analysis purposes:

- Winter and summer solstices (December 21 and June 21), when the sun is at its lowest and highest point, respectively, and
- Spring and fall equinoxes (March 21 and September 21), when day and night are of approximately equal length.

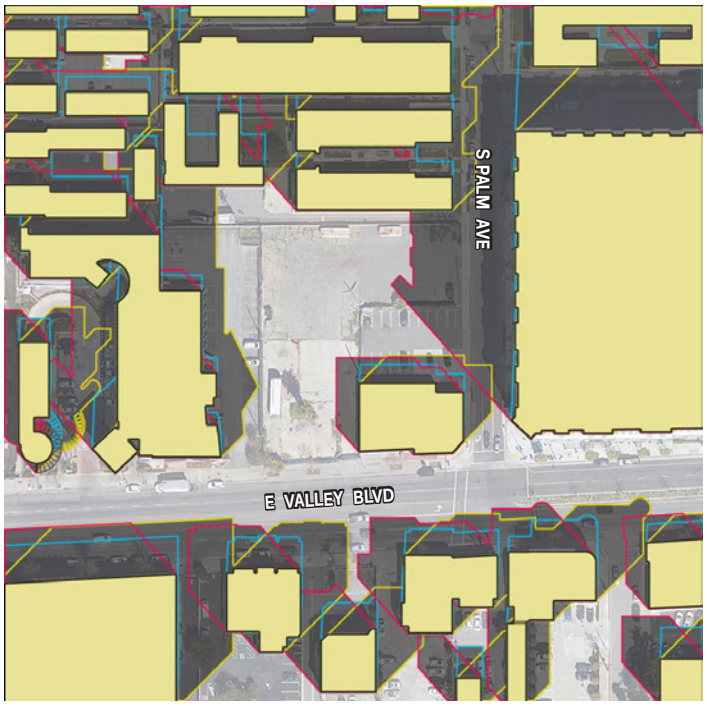
A project would have a significant impact pertaining to the degradation of character/quality if it would substantially block sunlight for neighboring buildings. Since the City of San Gabriel does not have a specific adopted threshold to determine whether or not increased shade/shadow patterns are considered significant, this analysis considers the City of Los Angeles' adopted threshold. The urbanized character of the City is similar to that of Los Angeles (pertaining to potential shade/shadow concerns) and Los Angeles is one of the few cities in southern California with an adopted threshold of significance for shade/shadow impacts. Thus, for the purposes of this analysis, a project would have a significant impact if:

- Shadow-sensitive use areas (where sunlight is important to its function) would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October), compared to existing conditions.

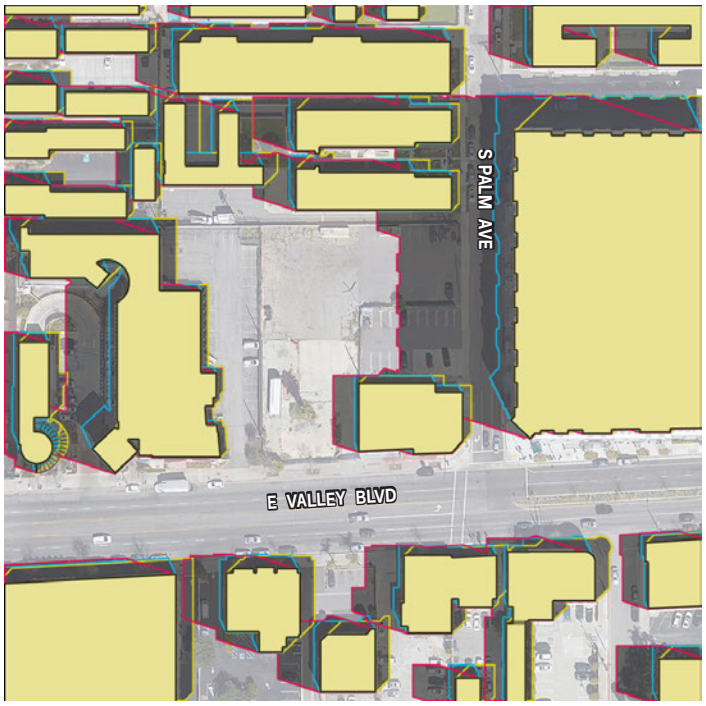
Existing Shade/Shadow Conditions

There are no existing on-site buildings, therefore, no shadows are cast from the project site and no shadow-sensitive uses would be shaded by existing on-site conditions. However, under existing conditions, there are shadow-sensitive uses (residential uses to the north) that are currently shaded by other off-site structures in the project vicinity (commercial buildings to the east); refer to Exhibit 4.1-1, *Existing Shade/Shadow Patterns*.

Late October to Early April

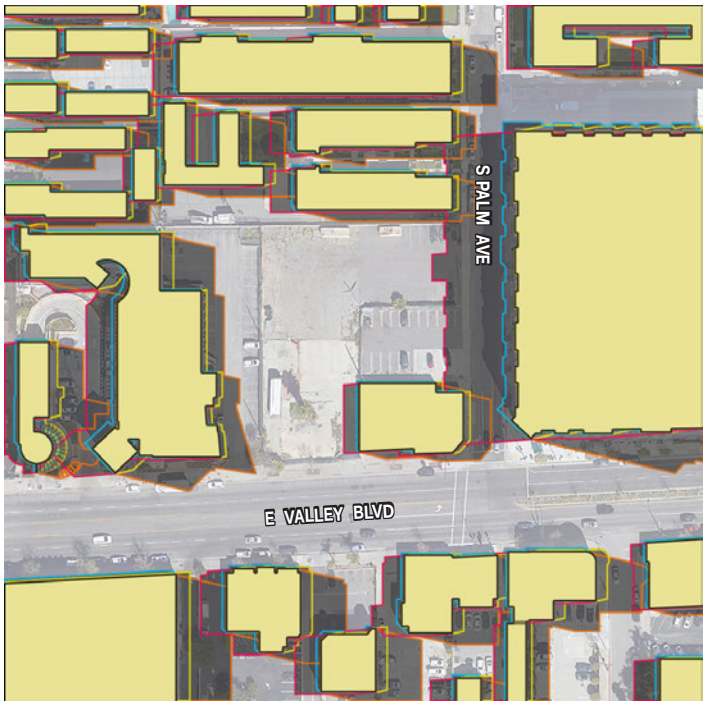


Winter Solstice

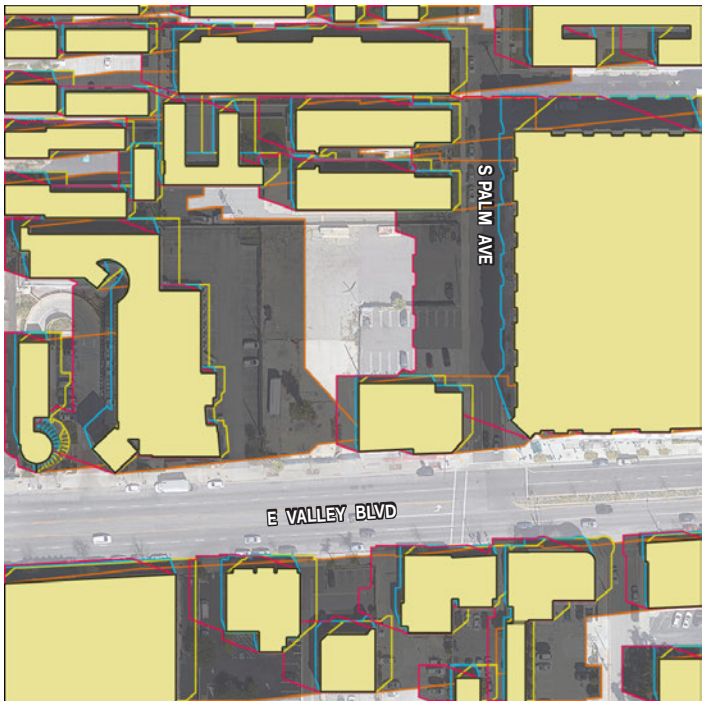


Vernal Equinox

Early April to Late October



Summer Solstice



Autumnal Equinox

LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
- 6 p.m. Shadow Pattern

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

Michael Baker INTERNATIONAL

NOT TO SCALE

08/2021 JN 185256

205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Existing Shade/Shadow Patterns

Exhibit 4.1-1

Proposed Shade/Shadow Conditions

Early April to Late October

Summer Months. As illustrated on Exhibit 4.1-2, *Proposed Shade/Shadow Patterns*, the proposed project would cast shade to off-site uses for greater than four hours between the hours of 9:00 a.m. and 6:00 p.m. during the summer months. Commercial uses to the east would be shaded between 3:00 p.m. and 6:00 p.m., along with institutional uses to the west (between 9:00 a.m. and 3:00 p.m.), and a portion of South Palm Avenue (between 3:00 p.m. and 6:00 p.m.). However, these areas are not considered shadow-sensitive (as sunlight is not important to its function) and/or routinely useable outdoor space. Further, South Palm Avenue already experiences partial shading under existing conditions from shadows cast by existing off-site structures. Thus, during the summer months, surrounding shadow-sensitive uses would not experience significant shading impacts as a result of the proposed project.

Fall Months. As illustrated on Exhibit 4.1-2, the proposed project would cast shade to off-site uses for greater than four hours between the hours of 9:00 a.m. and 6:00 p.m. during the fall months. Residential uses (driveway area) to the north would be shaded between 9:00 a.m. and 6:00 p.m. Institutional uses to the west (between 9:00 a.m. and 3:00 p.m.), commercial uses to the east (between 3:00 p.m. and 6:00 p.m.), and a portion of South Palm Avenue (between 3:00 p.m. and 6:00 p.m.) would also be shaded for more than four hours between 9:00 a.m. and 6:00 p.m. However, all of these areas (including the driveway areas of the northern residences) are not considered shadow-sensitive (as sunlight is not important to its function). Further, these areas already experience partial shading under existing conditions from shadows cast by existing off-site structures. Thus, during the fall months, surrounding uses would not experience significant shadow impacts as a result of the proposed project.

Late October to Early April

Winter Months. As illustrated on Exhibit 4.1-2, the proposed project would cast shade for greater than three hours between 9:00 a.m. and 3:00 p.m. at off-site areas in the winter months. The areas shaded for more than three hours (between 9:00 a.m. and 3:00 p.m.) include the adjacent residences to the north of the project site, specifically the entryway, driveway, and open space area. The open space area associated with the residences is considered shadow-sensitive. However, the impacted shaded area is already shaded under existing conditions as a result of an existing mature tree. Therefore, the project would not result in significant shade/shadow impacts during the winter months compared to existing conditions.

Spring Months. As illustrated on Exhibit 4.1-2, the proposed project would cast shade for greater than three hours between 9:00 a.m. and 3:00 p.m. at off-site areas during the spring months. The areas shaded for more than three hours include the adjacent residences to the north (between 9:00 a.m. and 3:00 p.m. [driveway areas]) and institutional uses to the west (between 9:00 a.m. and 3:00 p.m. [parking areas only]). However, these areas are not considered shadow-sensitive (as sunlight is not important to its function) and/or routinely useable outdoor space. Therefore, the project would not result in significant shade/shadow impacts during the spring months.

Although portions of the residential development to the north would experience shading as a result of the project, these areas are not considered shadow-sensitive (entryway and driveway) with the exception of the open space area. However, under existing conditions, this particular area is already substantially shaded due to a mature tree at that location. As such, the proposed project would not result in significant increased shading of any shadow-sensitive uses compared to the existing condition. Impacts in this regard would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

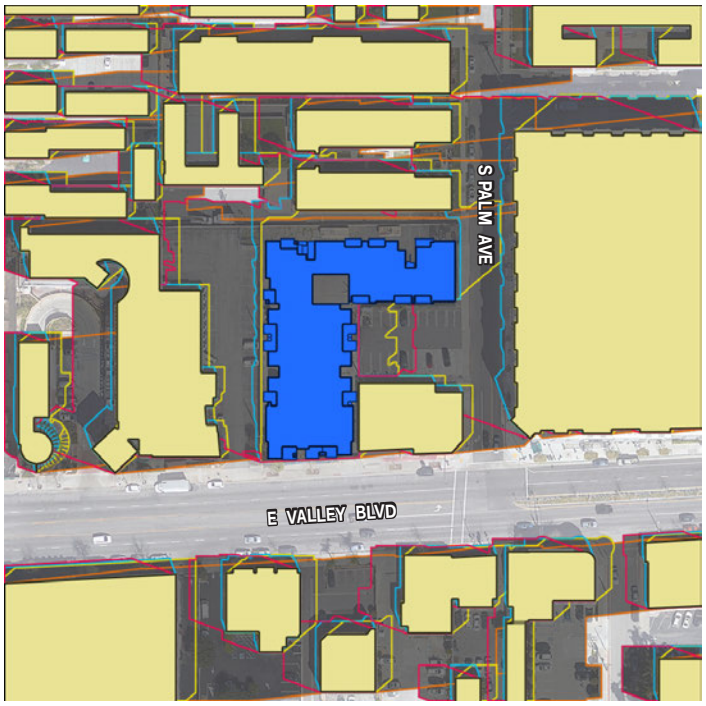
Late October to Early April

Winter Solstice

Vernal Equinox

Early April to Late October

Summer Solstice



Autumnal Equinox

LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
- 6 p.m. Shadow Pattern

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

Michael Baker INTERNATIONAL

NOT TO SCALE

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205 EAST VALLEY BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Proposed Shade/Shadow Patterns

Exhibit 4.1-2

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 site is located in an urbanized area of San Gabriel with existing sources of light and glare. Existing sources include street lights and vehicular lights primarily along East Valley Boulevard, exterior and interior lighting of adjacent commercial and residential buildings, and commercial signage lighting.

A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

CONSTRUCTION

Project construction could involve temporary glare impacts as a result of construction equipment and materials. However, based on the project's limited scope of activities, these sources of glare would not be substantial. Additionally, the project would comply with Municipal Code Section 150.003, *Construction; Hours of Construction*, for allowable construction hours, which are limited to between 7:00 a.m. to 7:00 p.m. (Mondays through Friday), and 8:00 a.m. to 4:00 p.m. on Saturdays. No construction is allowed on Sundays. Thus, as no construction activities would be permitted after 7:00 p.m. on weekdays, after 4:00 p.m. on Saturdays, or on Sundays, short-term construction-related impacts to nighttime lighting would be less than significant.

OPERATIONS

The proposed project would increase lighting at the project site compared to existing conditions. However, the light and glare intensity caused by the proposed development would be similar to that generated by existing residential and commercial uses near the site. The project would also be required to comply with the exterior lighting, security lighting, and shielded lighting requirements included in Municipal Code Sections 150.218, *Special Residential Provisions*, and 150.219, *Special Commercial Provisions*, which requires all luminaries be directed or shielded so as not to be directly visible from any dwelling unit or to cause off-site glare or nuisance.

The project's exterior building materials are anticipated to include concrete masonry unit block, painted stucco, window glazing, parapet/trim, and awnings. If not properly treated, these materials could result in increased daytime glare. However, the project would be subject to special site plan and design review as required by the City's Precise Plan of Design process. This regulatory procedure would review the project's building materials to ensure neighboring uses are not exposed to substantial daytime glare. Impacts would be less than significant in this regard.

***Mitigation Measures*:** No mitigation measures are required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
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?				✓

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. According to the California Department of Conservation, the project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland).[1] The closest identified farmland (Unique Farmland) is located more than 0.5-mile west of the project site. As such, project implementation would not convert farmland to non-agricultural use. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[1] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed September 17, 2021.

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

No Impact. The project site is zoned Mixed-Use Transit Oriented Development (MU-T) and is not covered under a Williamson Act contract.[2] Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur in this regard.

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. The project site is zoned MU-T. Thus, project implementation would not conflict with existing zone for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur in this regard.

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. Refer to Response 4.2(c). No impact would occur in this regard.

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). No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Conservation, Division of Land Resource Protection, *Los Angeles County Williamson Act FY 2016/2017*, 2017.

4.3 AIR QUALITY

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

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 (Basin), which is governed by the South Coast Air Quality Management District (SCAQMD). Consistency with the SCAQMD *2022 Air Quality Management Plan for the South Coast Air Basin* (2022 AQMP) means that a project is consistent with the goals, objectives, and assumptions set forth in the 2022 AQMP that are designed to achieve Federal and State air quality standards. The 2022 AQMP utilizes information and data from the Southern California Association of Government (SCAG) 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). As such, this consistency analysis is based off the 2022 AQMP and 2020-2045 RTP/SCS. According to the SCAQMD *CEQA Air Quality Handbook*, to determine consistency with the 2022 AQMP, two main criteria must be addressed:

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 under Responses 4.3(b) and 4.3(c), the project's short-term construction emissions, long-term operational emissions, and localized concentrations of carbon monoxide (CO), nitrogen oxides (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) would result in less than significant impacts 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 volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOC plays in ozone (O_3) formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. As such, the project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the 2022 AQMP.

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

As discussed in Response 4.3(b), construction and operations of the proposed project would result in emissions that are below the SCAQMD construction and operational thresholds. Therefore, the proposed project would not cause or contribute to new air quality violations.

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

As discussed in Responses 4.3(b) and 4.3(c), the proposed project would result in less than significant impacts regarding localized concentrations during project construction and operation. As such, the proposed project would not delay the timely attainment of air quality standards or 2022 AQMP interim emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the 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 proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds the assumptions reflected in the 2022 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?

In the case of the 2022 AQMP, three sources of data form the basis for the projections of air pollutant emissions: *The Comprehensive General Plan of the City of San Gabriel, California* (General Plan), SCAG's *Growth Management* Chapter of the *Regional Comprehensive Plan* (RCP), and SCAG's 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS also provides socioeconomic forecast projections of regional population growth. The project site is designated Commercial Specific Plan and located within the *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan* (Specific Plan) area. According to the *City of San Gabriel Zoning Map* (Zoning Map) and Specific Plan, the project site is zoned Mixed-Use Transit Oriented Development (MU-T). The project would be consistent with the site's current land use designation and zoning and would not require a General Plan Amendment or Zone Change. In addition, as discussed in Section 4.14, *Population and Housing*, the proposed project would not induce substantial unplanned population growth exceeding existing local conditions and/or regional population projections. Therefore, the proposed project would be consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the 2022-2045 RTP/SCS. Additionally, as the SCAQMD has incorporated these same projections into the 2022 AQMP, it can be concluded that the proposed project would be consistent with the projections included in the 2022 AQMP.

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

The proposed project would not require mitigation and would result in less than significant air quality impacts; refer to Responses 4.3(b) and 4.3(c). In addition, the project would be required to comply with all applicable SCAQMD rules and regulations, including Rule 403 that requires excessive fugitive dust emissions controlled by regular watering or other dust prevention measures and Rule 1113 that regulates the VOC content of paint. As such, the proposed project would meet this 2022 AQMP consistency criterion.

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

As discussed in Section 4.8, *Greenhouse Gas Emissions*, the project would implement various SCAG policies and is considered an infill development. Further, the project would be consistent with the goals of Senate Bill 375. Specifically, the project site is located within 500 feet of an existing Metro bus stop (Line 76 and Routes 487/489) and proposes on-site bicycle parking spaces and electric vehicle (EV) charging stations, which would incentivize residents, employees, and visitors to utilize alternative transportation modes and therefore lower criteria pollutant emissions. In addition, the project would be consistent with the site's land use designation and zoning. As such, the proposed project would meet this 2022 AQMP consistency criterion.

In conclusion, the determination of 2022 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. Additionally, the proposed project would be consistent with the goals and policies of the 2022 AQMP. As discussed above, the proposed project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies and is, therefore, considered consistent with the 2022 AQMP.

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.

Criteria Pollutants

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 percent 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 CO.

Ozone (O_3). O_3 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 (the "good" O_3 layer) extends upward from about 10 to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O_3 is a photochemical pollutant, and needs VOCs, NO_X, and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. O_3 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 O_3. Short-term exposure (lasting for a few hours) to O_3 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.

Nitrogen Dioxide (NO_2). NO_2 (often used interchangeably with NO_X) are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 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 NO_2 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 NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} 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 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 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.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. SO_2 is often used interchangeably with sulfur oxides (SO_X) and lead. Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). 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 O_3 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: CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.

Reactive Organic Gases (ROG). Similar to VOC, ROG are also precursors in forming O_3 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 ROG and NO_x react in the presence of sunlight. ROGs are criteria pollutants since they are precursors to O_3, which is a criteria pollutant.

Short-Term Construction Emissions

Short-term air quality impacts are predicted to occur during grading and construction activities associated with implementation of the proposed project. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction;
- Exhaust emissions from construction equipment and motor vehicles of the construction crew; and
- ROG/VOC emissions from application of asphalt and surface coatings.

Construction activities would include demolition, grading, building construction, and architectural coating. Due to the slope of the project site, grading would require approximately 26,000 cubic yards of cut and 2,000 cubic yards of fill, resulting in approximately 24,000 cubic yards of soil export. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) version 2020.4.0. Refer to Appendix B, *AQ/GHG/Energy Data*, for the CalEEMod outputs and results. Table 4.3-1, *Maximum Daily Construction Emissions*, presents the project's anticipated daily short-term construction emissions.

Table 4.3-1
Maximum Daily Construction Emissions

Emissions Source	Pollutant (pounds/day) [1]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1						
Construction Emissions[2]	2.07	39.58	13.27	0.10	5.99	2.74
Year 2						
Construction Emissions[2]	1.10	9.61	10.96	0.02	1.25	0.62
Year 3						
Construction Emissions[2]	10.06	8.95	10.75	0.02	1.21	0.58
Maximum Daily Construction Emissions	**10.06**	**39.58**	**13.27**	**0.10**	**5.99**	**2.74**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD. Winter emissions represent worst-case scenario and is therefore presented as a conservative analysis.
2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stockpiles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.

Refer to Appendix B for assumptions used in this analysis.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust in the form of particulate matter (PM_{10} and $PM_{2.5}$) emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, grading, and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

Construction activities would comply with SCAQMD Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce PM_{10} and $PM_{2.5}$ concentrations. It should be noted that these reductions were applied in CalEEMod. As depicted in Table 4.3-1, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Therefore, particulate matter impacts during construction would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. Standard SCAQMD regulations, such as maintaining all construction equipment in proper tune and shutting down equipment when not in use for extended periods of time would be implemented. As noted in Table 4.3-1, construction equipment and worker vehicle exhaust would not exceed SCAQMD thresholds. Therefore, impacts are less than significant in this regard.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Regulation XI, Rule 1113 – *Architectural Coating,* all architectural coatings for the proposed structures would comply with specifications on painting practices as well as regulation on the ROG content of paint. ROG emissions associated with the proposed project would be less than significant; refer to Table 4.3-1.

Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in Table 4.3-1, criteria pollutant emissions during construction of the proposed project would not exceed the SCAQMD significance thresholds. Thus, impacts due to the total construction related emissions 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 to 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 California Department of Conservation Division of Mines and Geology, serpentinite and ultramafic rocks are not known to occur within the project area. [1] Thus, there would be no impact in this regard.

Long-Term Operational Emissions

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. The analysis of daily operational emissions has been prepared by utilizing the CalEEMod Version 2020.4.0. Table 4.3-2, *Long-Term Operational Air Emissions*, presents the anticipated project-related operational emissions. Emissions from each source are discussed in more detail below.

Table 4.3-2
Long-Term Operational Air Emissions

Scenario	Emissions (pounds per day)[1,3,4]					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Proposed Project Summer Emissions						
Area Source	1.70	0.80	3.53	0.01	0.08	0.08
Energy Source	0.02	0.17	0.08	<0.01	0.01	0.01
Mobile	1.36	1.32	13.26	0.03	3.04	0.82
Total Summer Emissions[2]	**3.07**	**2.30**	**16.86**	**0.04**	**3.13**	**0.92**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Proposed Project Winter Emissions						
Area Source	1.70	0.80	3.53	0.01	0.08	0.08
Energy Source	0.02	0.17	0.08	<0.01	0.01	0.01
Mobile	1.33	1.43	13.02	0.03	3.04	0.82
Total Winter Emissions[2]	**3.05**	**2.40**	**16.63**	**0.03**	**3.13**	**0.92**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. The numbers may be slightly off due to rounding.
3. Project operational emissions were modeled with the operational year of 2024, consistent with the Trip Generation/VMT Memo.
4. The emissions data modeled in CalEEMod is with the implementation of the SCAQMD Rule 403 and Rule 445. The mitigation includes the following: properly maintain mobile and other construction equipment; replace the ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour; only natural gas hearth per SCAQMD Rule 445.
5. Project would incorporate design features that were modeled in CalEEMod, including on-site renewable energy generation, energy efficient appliances, and all electric landscaping equipment.

Refer to Appendix B for assumptions used in this analysis.

[1] California Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report, August 2000*, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed August 23, 2021.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

The project-generated vehicle emissions have been estimated using CalEEMod for the buildout year 2024. This model predicts ROG, CO, SO_X, NO_X, PM_{10}, and $PM_{2.5}$ emissions from motor vehicle traffic associated with new land uses; refer to Appendix B. According to the *Proposed 205 E. Valley Boulevard Residential Mixed-Use Project Traffic Letter* (Trip Generation/VMT Memo), prepared by KOA Corporation (dated August 18, 2021), the proposed project would generate 485 daily trips; refer to Appendix G, *Trip Generation/VMT Memo*. Table 4.3-2 presents the anticipated mobile source emissions. As shown, project-related operational emissions would be below the SCAQMD thresholds. As such, a less than significant impact would occur due to the proposed project operational mobile emissions.

Area Source Emissions

Area source emissions are generated from consumer products, architectural coating, landscaping, and hearths (wood stoves and fireplaces). On March 7, 2008, SCAQMD adopted Rule 445. SCAQMD Rule 445 prohibits the permanent installation of a wood-burning device in any residential development that begun construction on March 9, 2009. Area source emissions would be generated due to an increased demand for consumer products, landscape equipment usage, and area architectural coating associated with the development of the proposed project; refer to Table 4.3-2. The project's operational area source emissions for all criteria pollutants would be below the SCAQMD's significance thresholds.

Energy Source Emissions

Energy source emissions (i.e., generated at the site of the power generation source) would be generated as a result of electricity and natural gas (non-hearth) 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. It should be noted that the project would comply with the most current version of the California Building Code and Title 24 standards which would further reduce the project's energy use. The project would install energy efficient appliances and solar ready roofs, and generate approximately 315,300 kilowatt hours per year of renewable energy on-site. As such, the project's operational emissions would not exceed the SCAQMD regional thresholds for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$; refer to Table 4.3-2. Therefore, a less than significant impact would occur in this regard.

Total Operational Emissions

As shown in Table 4.3-2, the operational emissions from the project would not exceed regional thresholds of significance established by the SCAQMD for criteria air emissions. Therefore, impacts in this regard would be less than significant.

Air Quality Health Impacts

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 individual [e.g., age, gender]). In particular, O_3 precursors, VOCs and NO_x, affect air quality on a regional scale. Health effects related to O_3 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,

as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

Further, as noted in the *Brief of Amicus Curiae* by the SCAQMD[2], the SCAQMD acknowledges 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. Furthermore, as noted in the *Brief of Amicus Curiae* by the San Joaquin Valley Air Pollution Control District (SJVAPCD)[3], SJVAPCD acknowledges 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.

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 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 O_3 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 O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-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. Thus, as the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Cumulative Construction Impacts

With respect to the proposed project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2022 AQMP pursuant to Federal Clean Air Act mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements and implement all feasible SCAQMD rules to reduce construction air emissions to the extent feasible. 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 proposed project. In addition, the proposed project would comply with adopted AQMP emissions control measures. Pursuant to SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

As discussed above, the project's short-term construction emissions would be below the SCAQMD thresholds and would result in a less than significant impact. Thus, it can be reasonably inferred that the project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. A less than significant impact would occur in this regard.

[2] South Coast Air Quality Management District, *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.

[3] San Joaquin Valley Air Pollution Control District, *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.

Cumulative Operational Impacts

As discussed previously, the proposed project would not result in long-term air quality impacts, as emissions would not exceed SCAQMD-adopted operational 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 proposed project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Cumulative operational impacts associated with implementation of the proposed project would be less than significant.

***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. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. 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.

The closest sensitive receptors near the project site are the multi-family residences located adjacent to the northern project boundary. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for construction and operations 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 air quality impacts. The SCAQMD provides the LST screening lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The project is located within Source Receptor Area (SRA) 8, West San Gabriel Valley.

Construction LST

The SCAQMD's guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. SCAQMD provides LST thresholds for one-, two-, and five-acre site disturbance areas; SCAQMD does not provide LST thresholds for projects over five acres. Based on default information provided by CalEEMod, the project is anticipated to disturb up to 22 acres during the grading phase. The grading phase would take approximately 22 days to complete. As such, the project would actively disturb an average of approximately 1 acre per day (22 acres divided by 22 days). Therefore, the LST thresholds for one acre were utilized for the construction LST analysis. The closest sensitive receptors to the project site may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive uses are located adjacent to the north of the project site, the LST values for 25 meters (82 feet) were used.

Table 4.3-3, *Localized Significance of Construction Emissions*, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 8. It is noted that the localized emissions presented in Table

4.3-3 are less than those in Table 4.3-1 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in Table 4.3-3, the project's localized construction emissions would not exceed the LSTs for SRA 8. Therefore, localized significance impacts from construction emissions would be less than significant.

Table 4.3-3
Localized Significance of Construction Emissions

Phase	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (on-site)[1, 2]	15.73	11.72	3.34	1.90
Localized Significance Threshold[3]	*69*	*535*	*4*	*7*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes:
1. The demolition phase emissions during Year 1 present the worst-case scenario for CO, and the grading phase emissions during Year 1 present the worst-case scenario for NO_X, PM_{10} and $PM_{2.5}$.
2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stock piles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.
3. The Localized Significance Threshold was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately one acre per day; therefore, the threshold for one acre was used), distance to closest sensitive receptor (25 meters), and Source Receptor Area 8.

Refer to Appendix B for assumptions used in this analysis.

Operational LST

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). Occasional truck deliveries (once to twice per month) and trash pickup (once per week) would occur at the project. These truck delivery/trash pickup activities would be intermittent and would not include extended periods of idling time; therefore, idling emissions from truck deliveries and trash pickup would be minimal. Additionally, potential emergency vehicle trips to and from the project site would be sporadic and would not idle on-site or along adjacent roadways for long periods of time. Thus, due to the lack of such emissions, no long-term LST analysis is necessary. Operational LST impacts would be less than significant in this regard.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, and the elderly).

The Basin is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased nationwide; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[4]

[4] U.S. Environmental Protection Agency, *Carbon Monoxide Emissions*, https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10, accessed August 23, 2021.

Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*, which is the most recent AQMP that addresses CO concentrations. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles County experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm one-hour CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in southern California with an average daily trip volume of approximately 100,000 vehicles per day. As CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections within the City of San Gabriel near the project site due to the comparatively low volume of traffic (a maximum of 485 average daily trips, including 28 trips during the a.m. peak hour and 37 trips during the p.m. peak hour) that would occur as a result of project implementation.

According to the SCAQMD *CEQA Air Quality Handbook*, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 parts per million (ppm), which is the 8-hour California ambient air quality standard. The closest monitoring station to the project site that monitors CO concentration is Pasadena – S Wilson Avenue station, which is located approximately 4.0 miles north of the project site. The maximum CO concentration at is Pasadena – S Wilson Avenue station was measured at 2.635 ppm in 2020.[5] Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hotspot would not occur at the project site. Therefore, impacts would be less than significant in this regard.

Localized Air Quality Health Impacts

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds, and CO hotpots would not occur as a result of the proposed project. Therefore, the project would not exceed the most stringent applicable Federal or State ambient air quality standards for emissions of CO, NO_X, PM_{10}, or $PM_{2.5}$. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (e.g., children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, an air quality health impact would be less than significant in this regard.

Conclusion

In conclusion, the project would not expose sensitive receptors to substantial pollutant concentrations as the project would not exceed the SCAQMD LST thresholds, would not cause a CO hotspot, and would not create a localized air quality health impact. A less than significant impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

[5] California Air Resources Board, AQMIS2: Air Quality Data, https://www.arb.ca.gov/aqmis2/display.php?param=CO&year=2020&units=007&report=SITE1YR&statistic=DMAX&site=2160&ptype=aqd, accessed September 7, 2021.

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 *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. The proposed project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The project would also comply with the SCAQMD Regulation XI, *Rule 1113 – Architectural Coating*, which would minimize odor impacts from VOC emissions during architectural coating. Any impacts to existing adjacent land uses would be short-term and are less than significant.

***Mitigation Measures*:** No mitigation measures are required.

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4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 Game 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 Game or U.S. Fish and Wildlife Service?				✓
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 sites?			✓	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

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

No Impact. The project site is located within a built out, urbanized area of the City and is currently developed as an asphalt surface parking lot. The project site supports minimal vegetation, with a few ornamental trees and some small shrubs scattered throughout the site.

Based on the project site's disturbed condition and lack of native vegetation, project construction would not adversely impact candidate, sensitive, or special status biological resources. Further, no listed or sensitive habitat that could support such species are present on-site. Thus, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. 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 project site is an existing surface parking lot located in an urbanized and built out area of San Gabriel. No riparian habitat or other sensitive natural communities are present in the project area; refer to General Plan Figure 8-1, *Environmental Resources*. Additionally, the project area is not included in local or regional plans, policies, or regulations that identify riparian habitat or other sensitive natural communities. No impact would occur in this regard.

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. No State or Federally protected wetlands are located within the project site.[1] As discussed, the project site is heavily disturbed and is completely developed. The project would not involve direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands. As such, no impact would occur in this regard.

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 sites?

Less Than Significant Impact. The project site is entirely developed and surrounded on all sides by existing urban uses. There are no areas within the project vicinity which could function as a wildlife corridor or nursery site for native and migratory wildlife. Further, the minimal on-site vegetation (i.e., shrubs and non-native weeds) do not provide suitable nesting habitat for migratory birds. However, the existing ornamental trees on-site have the potential to 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, or nests. Mandatory compliance with the MBTA would reduce the project's potential construction-related impacts to nesting birds. Impacts would be less than significant in this regard.

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?

No Impact. Landmark, historically significant, and mature trees located within Multiple Family, Commercial, and Industrial zones are protected under Municipal Code Title IX Chapter 95.35, *Tree Protection and Preservation Regulations; Multiple Family, Commercial and Industrial Zones*. Landmark or historically significant trees include any trees (excluding palm trees) that meet the following criteria: 1) A tree or stand of trees which have taken on an aura of historical value by virtue of age or location; and/or 2) a tree which has a trunk with a 40-inch circumference (12.75-inch diameter) if located in the front yard or 60 inches in circumference (19-inch diameter) if located in the rear and side

[1] U.S. Fish and Wildlife Service, *National Wetlands Inventory*, https://www.fws.gov/wetlands/data/Mapper.html, accessed September 15, 2021.

yards. Mature trees are defined as any variety of a tree (except fruit trees) that is more than 12.5 inches in circumference (4-inch diameter) when measured at a point four feet above the natural grade.

As discussed in Response 4.4(a), the project site supports minimal vegetation, with few ornamental trees and some shrubs scattered throughout the site. The on-site trees do not qualify as landmark, historically significant, or mature trees. Thus, no impacts would occur in this regard.

Street trees are protected under Municipal Code Title IX Chapter 95, *Trees and Shrubs; Weeds*, which stipulates that street trees and shrubs may only be removed after obtaining a tree removal permit from the Community Development Director. Project implementation would not require the removal of street trees. Thus, no impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

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

No Impact. According to the California Department of Fish and Wildlife, the proposed project is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan.[2] No other approved local, regional, or State habitat conversation plans apply to the site. Thus, development of the proposed project would not conflict with any approved habitat conservation plan. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, April 2019.

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4.5 CULTURAL RESOURCES

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

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

No Impact. The project site is located within a heavily urbanized and mixed-use area of San Gabriel. According to the General Plan, there are several clusters of significant pre-and post-American structures, including adobes more than 150 years old, within the City; refer to General Plan Figure 11-1, *Cultural Resources*. One historically significant building, the former West San Gabriel Valley Association of Realtors Auditorium, was located to the east of the project site prior to the construction of the Sheraton hotel. As an existing surface parking lot, there are no historic resources on-site. Therefore, project implementation would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. Given the nature of the project area and the disturbed nature of the project site, no cultural resources are expected to occur on-site. However, the site could contain previously undiscovered archaeological resources. Project construction activities would involve approximately 26,000 cubic yards of cut and approximately 2,000 cubic yards of fill. Thus, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. Should project excavation activities encounter previously undiscovered archaeological resources, Mitigation Measure CUL-1 would require all construction work to halt until a qualified archaeologist evaluates the find. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be reduced to less than significant levels.

Mitigation Measures:

CUL-1 If previously unidentified cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be retained by the Applicant immediately to evaluate the find. If the discovery proves to be significant under the California Environmental Quality Act (CEQA), additional work such as data recovery excavation may be warranted to mitigate any significant impacts. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project Applicant and City of San Gabriel to

implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.

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

Less Than Significant Impact. Due to the developed and built out nature of the project area, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, project construction activities would involve approximately 26,000 cubic yards of cut and approximately 2,000 cubic yards of fill. Thus, project excavation could potentially encounter buried human remains. If human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5 through 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission and consultation with the individual identified by the Native American Heritage Commission to be the most likely descendant. If human remains are found during excavation, excavation must stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains are less than significant.

Mitigation Measures: No mitigation measures are required.

4.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 FRAMEWORK

State

Senate Bill 100

Senate Bill (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 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. SB 100 requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board, and all other State agencies incorporate this policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and State board to utilize programs authorized under existing statutes to achieve such renewable energy goals.

California Building Energy Efficiency Standards (Title 24)

The *2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. 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. The standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more.

California Green Building Standards (CALGreen)

The California Green Building Standards (CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is

growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[1]

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared an *Energy Efficiency Strategic Plan* (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and GHG reductions. 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 from 2009 to 2020 and beyond. The Strategic Plan contains the practical strategies and actions to attain significant Statewide energy savings, because of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the following 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. HVAC will be transformed to ensure that its energy performance is optimal for California's climate; and
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 Senate Bill (SB) 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two 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 *2020 Integrated Energy Policy Report Update* (2020 IEPR Update) Volume I and Volume III on March 17, 2021, and Volume II on April 14, 2021.[2] The 2020 IEPR Update provides the results of the CEC's assessments of a variety of energy issues facing California, many of which will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs.[3] The year of 2020 was unprecedented as the State continues to face the impacts and repercussions of several events including the COVID-19 pandemic, electricity outages, and Statewide wildfires. In response to these challenging events, the 2020 IEPR Update covers a broad range of topics, including transportation, microgrids, and the California Energy Demand Forecast. Volume I of the 2020 IEPR Update focuses on California's transportation future and the transition to zero-emission vehicles; Volume II examines microgrids, lessons learned from a decade of State-supported research, and stakeholder feedback on the potential of microgrids to contribute to a clean and resilient energy system; and Volume III reports on California's energy demand outlook, updated to reflect the global pandemic and help plan for a growth in zero-emission plug in electric vehicles.[4] Overall, the 2020 IEPR Update identifies actions the State and others can take that would strengthen energy resiliency, reduce GHG emissions that cause climate change, improve air quality, and contribute to a more equitable future.

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1 U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed September 2, 2021.

2 California Energy Commission, *2020 Integrated Energy Policy Report Update Schedule*, March 25, 2021, https://www.energy.ca.gov/sites/default/files/2021-03/Workshop%20Schedule%20for%20Web%203.25.21_Updated_ADA.pdf, accessed September 2, 2021.

3 California Energy Commission, *Final 2020 Integrated Energy Policy Report Update, Volume I: Blue Skies, Clean Transportation*, March 2021, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update-0, accessed September 2, 2021.

4 Ibid.

Executive Order N-79-20

Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

Local

City of San Gabriel Energy Action Plan

The San Gabriel City Council adopted the City's first *Energy Action Plan* (EAP) on November 20, 2012. The EAP was developed in partnership with the San Gabriel Valley Council of Governments (SGVCOG) and Southern California Edison (SCE). The intent of the EAP is to:

- Make it easier for residents and businesses to finance energy efficient improvements and save money on energy bills;
- Provide a roadmap for reducing the City's energy bills;
- Reduce the City and community's impact on the environment;
- Provide the City with critical baseline data that the State requires for cities to address greenhouse gas emissions;
- Enable the City to receive additional grants; and
- Serve as a foundation for future planning efforts such as general plan updates, climate action plans, housing element updates, and zoning code updates, among others.

METHODOLOGY

The impact analysis focuses on the three sources of energy that are relevant to the proposed project: electricity, natural gas, and transportation fuel for vehicle trips associated with project operations as well as the fuel necessary for project construction. The analysis of electricity/natural gas usage is based on the California Emissions Estimator Model (CalEEMod) version 2020.4.0 modeling, which quantifies energy use for occupancy. The project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for Los Angeles County, and consumption factors provided by SCE and Southern California Gas Company (SoCalGas), the electricity and natural gas provider for the project site, respectively. The results of the CalEEMod modeling are included in Appendix B, *AQ/GHG/Energy Data*. The amount of operational fuel use was estimated using the California Air Resources Board (CARB) Emissions Factor 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel (i.e., diesel and gasoline) usage in the County, and the project's trip generation from the *Proposed 205 E. Valley Boulevard Residential Mixed-Use Project Traffic Letter* (Trip Generation/VMT Memo) prepared by KOA Corporation (dated August 18, 2021). The estimated construction fuel consumption is based on the project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of EMFAC2017 modeling and construction fuel estimates are included in Appendix B.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis under Response 4.6(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.

- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.

- **Criterion 4**: The degree to which the project complies with existing energy standards.

- **Criterion 5**: The effects of the project on energy resources.

- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2, 4, and 5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criteria 2, 4, and 6**, and the building energy demand analysis discusses **Criteria 2, 3, 4, and 5**.

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.

PROJECT-RELATED SOURCES OF ENERGY CONSUMPTION

The project's estimated energy consumption is summarized in Table 4.6-1, *Project and Countywide Energy Consumption*. As shown in Table 4.6-1, the project's electricity usage would constitute an approximate 0.0002 percent increase over the County's typical annual electricity consumption and approximately 0.0002 percent increase over the County's typical annual natural gas consumption. The project's construction and operational fuel consumption would increase the County's consumption by 0.0133 percent and 0.0021 percent, respectively (**Criterion 1**).

Table 4.6-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	123 MWh	66,118,673 MWh	0.0002%
Natural Gas Consumption	6,837 therms	3,048,320,959 therms	0.0002%
Fuel Consumption			
• Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[3]	51,982 gallons	390,111,209 gallons	0.0133%
• Operational Automotive Fuel Consumption[3]	82,232 gallons	3,845,945,898 gallons	0.0021%

Notes:
1. As modeled in CalEEMod version 2020.4.0.
2. The project changes in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2019. The project increases in construction and automotive fuel consumption are compared with the projected Countywide fuel consumption in 2022 and 2024, respectively.
   Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms. energy.ca.gov/elecbycounty.aspx, accessed September 2, 2021.
   Los Angeles County natural gas consumption data source: California Energy Commission, *Gas Consumption by County*, http://www.ecdms.energy. ca.gov/gasbycounty.aspx, accessed September 2, 2021.
3. Project energy consumption is calculated based on CalEEMod results for the existing and proposed project conditions. Countywide fuel consumption is from the California Air Resources Board's EMFAC2017 model.

Refer to Appendix B for assumptions used in this analysis.

Construction-Related Energy Consumption

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, and architectural coating. As indicated in Table 4.6-1, the overall fuel consumption during project construction would be 51,982 gallons, which would result in a nominal increase (0.0133 percent) in fuel use in the County. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations Section 2485). Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

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 nonrecycled materials.[5] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would

[5] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed September 2, 2021.

be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**) and a less than significant impact would occur in this regard.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Based on the Trip Generation/VMT Memo, the project would generate 485 trips per day, including 28 trips during the a.m. peak hour and 37 trips during the p.m. peak hour. As indicated in Table 4.6-1, project operations are estimated to increase approximately 82,232 gallons of fuel consumption per year, which would increase Countywide automotive fuel consumption by 0.0021 percent. The project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the project. However, the project would include on-site electric vehicle charging stations and bicycle parking spaces in compliance with the CALGreen Code. This project design feature would encourage and support the use of electric vehicles and alternative transportation modes by residents, workers, and visitors of the project and thus reduce petroleum fuel consumption (**Criterion 4** and **Criterion 6**).

Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2020 to 2030 forecasts for energy consumption and peak demand in support of the 2019 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[6] CEC forecasts that the Statewide annual average growth rates of energy demand between 2019 and 2030 would be up to 1.10 percent for electricity and 0.16 percent for natural gas.[7] As shown in Table 4.6-1, operational energy consumption of the project would represent approximately 0.0002 percent increase in electricity and natural gas consumption over the current Countywide usage, which would be significantly below CEC's forecasts and the current Countywide usage. Therefore, the project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the project would consume energy during the same time periods as other residential and commercial developments. As a result, the project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The proposed project would be required to comply with the most current Title 24, which provides minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2022 Title 24 standards significantly reduces energy usage. The Title 24 standards are updated every three years and become more stringent between each update. As

[6] California Energy Commission, *California Energy Demand 2020-2030 Revised Forecast*, February 2020.
[7] Ibid.

such, complying with the latest 2022 Title 24 standards would make the proposed project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (**Criterion 4**).

The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by the end of 2020, 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent of total procurement by 2030. In addition, the project would install rooftop solar panels and generate renewable energy on-site. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that the project would not result in the waste of the finite energy resources (**Criterion 5**).

The project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

***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 City has adopted an EAP as part of a regional partnership between the City, SCE, and the SGVCOG. Past and current collaborative efforts between these partners have focused on improving energy efficiency by providing local governments with funding, technical support, and a forum for sharing information through the San Gabriel Valley Energy Wise Partnership. The EAP meets the requirements of the Energy Leader Partnership Model and is part of a larger regional effort to develop GHG emissions inventories and energy efficiency climate action plans for 27 participating cities in the SGVCOG. The purpose of the EAP is to identify the City's long-term vision and commitment to achieve energy efficiency in San Gabriel. The EAP notes that it could also serve as the foundation for future climate action planning projects.

The EAP identifies key energy efficiency targets and separate associated goals, policies, and actions for community and municipal activities. The project proposes to incorporate several energy efficiency design features that are consistent with the EAP efficiency measures. Table 4.6-2, *Energy Action Plan Consistency*, discusses the project's consistency with the applicable EAP policies.

Table 4.6-2
Energy Action Plan Consistency

EAP Measure	Project Consistency
Policy 3.1: The City would maximize the energy efficiency of new buildings.	**Consistent**. The project would comply with the most current version of the Title 24 standards and CALGreen and would use water-efficiency irrigation systems and include drought-tolerant landscape design.
Policy 3.2: Encourage the use of smart grid and energy star appliances in new development.	**Consistent**. Per the 2022 Title 24 standards, the project would install energy-efficient appliances and lighting throughout the project site. Additionally, the project would receive its electricity from SCE, which is required to comply with the RPS procurement goal of 50 percent renewable energy in 2030. Furthermore, the project would install rooftop solar panels and generate renewable energy on-site.
Policy 5.1: Maximize the cooling of buildings through tree planting and shading to reduce building electricity demands.	**Consistent**. The project would include a mix of trees and shrubs throughout the project site. Landscaping coverage would provide shade to the common areas and the proposed building, and therefore would maximize the cooling of buildings and reduce building energy demands.
Policy 6.2: Encourage the use of energy- and water-efficient water fixtures for indoor water use to reduce electricity use for water pumping.	**Consistent**. Energy- and water-efficient fixtures would be installed throughout the project site and would meet the current CALGreen energy efficiency requirements.
Policy 6.3: Support water-efficient landscaping to reduce the electricity demand for water transport and treatment.	**Consistent**. Water-efficient landscaping (i.e., water-efficient irrigation systems and devices) would be implemented in the project's landscaped areas, and the project's landscape design would include drought-tolerant plants.

Source: City of San Gabriel, *Energy Action Plan*, November 20, 2012.

As noted above, the proposed project would adhere to 2022 Title 24 and CALGreen standards and would implement several project design features consistent with the EAP. Therefore, the proposed project would help implement the EAP and would not conflict with an adopted plan, policy, or regulation pertaining to energy efficiency. A less than significant impact would occur.

***Mitigation Measures*:** No mitigation measures are required.

4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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:				
1) 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.				✓
2) Strong seismic ground shaking?		✓		
3) Seismic-related ground failure, including liquefaction?				✓
4) 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 soil, 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 waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	

This section is primarily based upon the *Report of Geotechnical Engineering Investigation, Proposed Mixed-Use Apartment with Two-Level Subterranean Parking at APN: 5369-018-002 & 020, 205 East Valley Boulevard, San Gabriel, California* (Geotechnical Investigation), prepared by Environmental Geotechnology Laboratory, Inc., dated December 10, 2020; refer to Appendix C, *Geotechnical Investigation*.

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

1) 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.

No Impact. Southern California, including the project area, is subject to the effects of seismic activity due to the 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 Earthquake Fault Zone. According to the California Geological Survey, the project site is not underlain by an Alquist-Priolo Earthquake Fault

Zone.[1] Further, according to the Geotechnical Investigation, no known active faults are located within the project site vicinity. Thus, project implementation would not involve rupture of a known earthquake fault. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

2) Strong seismic ground shaking?

Less Than Significant Impact With Mitigation Incorporated. Southern California has numerous active seismic faults subjecting people to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for people and structures, categorized either as primary or secondary hazards. Primary hazards are caused by the direct interaction of seismic energy with the ground; examples include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Secondary hazards are consequences of the shaking; examples include 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 Investigation, the project site is located in a seismically active region and is subject to seismically induced ground shaking from nearby and distant faults. According to the General Plan, seismic ground shaking is the primary seismic hazard affecting the City of San Gabriel due to its proximity to the San Andreas Fault and Sierra Madre Fault Zone. According to the California Geological Survey, the closest fault is the East Montebello fault, located approximately 0.67 miles southwest of the project site.[2]

The project would be required to comply with the California Building Standards Code, which includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the project site. In accordance with the California Building Standards Code and *San Gabriel Municipal Code* (Municipal Code) Section 150.001, *Adoption of the California Building Standards Code*, the project would be required to demonstrate compliance with the site-specific design recommendations identified in the Geotechnical Investigation to minimize the potential for damage and major injury during a seismic event; refer to Mitigation Measure GEO-1. Implementation of Mitigation Measure GEO-1 would ensure the construction and design recommendations in the Geotechnical Investigation are incorporated into the project design and grading and building plans. Following compliance with the California Building Standards Code and Municipal Code as well as implementation of Mitigation Measure GEO-1, impacts related to strong seismic ground shaking would be reduced to less than significant levels.

***Mitigation Measures*:**

GEO-1 Prior to issuance of a grading permit, the project Applicant shall demonstrate, to the satisfaction of the City of San Gabriel Public Works, that the recommendations for design and construction identified in the *Report of Geotechnical Engineering Investigation, Proposed Mixed-Use Apartment with Two-Level Subterranean Parking at APN: 5369-018-002 & 020, 205 East Valley Boulevard, San Gabriel, California*, prepared by Environmental Geotechnology Laboratory, Inc., and dated December 10, 2020, have been incorporated into the project design, grading, and building plans, as applicable.

[1] California Geologic Survey, *Alquist-Priolo Site Investigation Reports*, https://maps.conservation.ca.gov/cgs/informationwarehouse/apreports/, accessed August 30, 2021.
[2] Ibid.

3) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid.

According to the Geotechnical Investigation, the project site is located outside of the mapped potential liquefaction areas by the State of California. Therefore, the Geotechnical Investigation acknowledges that a liquefaction study is not required for the project site by the City and seismic-related ground failure, including liquefaction, is not anticipated at the project site. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

4) Landslides?

No Impact. Seismically induced landslides can overrun structures, people or property, sever utility lines, and block roads. The project site and surrounding areas are predominantly flat and built out and void of topographical features capable of producing a landslide (e.g., hillsides and slopes). Further, the Geotechnical Investigation concluded that the grading and proposed structures would be safe against hazard from landslide. Therefore, development of the proposed project would not expose people or structures to landslide hazards. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

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

Less Than Significant Impact.

CONSTRUCTION

Grading, earthwork, and landscape/hardscape installation activities associated with project construction could expose soils to potential short-term erosion by wind and water. As detailed in Section 2.2, *Environmental Setting*, on-site topography is relatively flat, averaging approximately 335 feet above mean sea level and gently slopes to the south-southeast. Thus, significant erosion by water is unlikely. Demolition and construction activities associated with the project would be required to implement construction best management practices (BMPs) to reduce urban runoff; refer to
Section 4.10, *Hydrology and Water Quality*. Applicable BMPs would be included in a Stormwater Pollution Prevention Plan (SWPPP) as part of the required National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Municipal Code Section 53.10, *Control of Pollutants from State Permitted Construction Activities*). Compliance with the General Construction Permit would minimize the potential of erosion and loss of topsoil at the project site during construction activities to a less than significant level.

OPERATIONS

Operations of the proposed project would not result in substantial soil erosion or the loss of topsoil as the majority of the project site would be developed with the mixed-use building. Aside from the proposed building, the remainder of the site would be paved or landscaped, and would not contain exposed soils; refer to Exhibit 2-3, *Conceptual Site Plan*. As a result, project operations would not result in substantial soil erosion or loss of topsoil and no impact would occur in this regard.

***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?

***No Impact*.** Refer to Responses 4.7(a)(3), 4.7(a)(4), and 4.7(d) for a discussion concerning liquefaction, landslides, and collapse (from expansive soils), respectively.

LATERAL SPREADING

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope 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. As discussed in Response 4.7(a)(3) above, liquefaction is not anticipated on the project site. As such, no impact would occur in this regard.

SUBSIDENCE

According to the U.S. Geological Survey, land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of rocks, such as fine-grained sediments. Events, other than the removal of groundwater, that can cause land subsidence include aquifer-system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost. According to the U.S. Geological Survey, the City of San Gabriel is not located within areas of recorded subsidence.[3] Additionally, project-related construction and operational activities do not involve any groundwater removal or other subsidence-causing activities. As such, no impacts are anticipated in this regard.

***Mitigation Measures*:** No mitigation measures are required.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

***Less Than Significant Impact With Mitigation Incorporated*.** 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.

The project's anticipated maximum depth of excavation is approximately 26 feet below the existing ground surface. According to the Geotechnical Investigation, the existing surficial soils on-site are not suitable for structure support and would require remedial grading. Specifically, the Geotechnical Investigation states that due to the difference in expansion characteristics of foundation materials beneath a structure, the construction areas should be cut to grade and observed for potential needs of removal of loose soils and replacement with compacted fill. The Geotechnical Investigation also includes recommendations for removal of and recompacting surface soils within the slab areas, or when expansive material is encountered during grading of the proposed slab area, as well as characteristics of import soils, including their expansion potential (less than 20 in expansion index). As discussed above, the project would be required to comply with Mitigation Measure GEO-1, which would ensure the construction and design recommendations in the Geotechnical Investigation are incorporated into the project design, grading, and building plans. With implementation of Mitigation Measure GEO-1, impacts in this regard would be reduced to less than significant levels.

[3] U.S. Geological Survey, *Areas of Land Subsidence in California*, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed August 31, 2021.

***Mitigation Measures*:** Refer to Mitigation Measure GEO-1.

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

***No Impact*.** No septic tanks or alternative wastewater systems would be constructed as part of the project. The proposed development would connect to existing wastewater infrastructure in the project area. No impact would occur in this regard.

***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 Investigation, the project area is underlain by alluvial soils to the maximum explored depth of 42 feet. In general, the site is underlain by alluvial gravel, sand, and silt of valleys and floodplains (Qa), potentially derived from materials eroded from the adjacent San Gabriel Mountain range; refer to Figure 3, *Regional Geology Map*, of the Geotechnical Investigation. Given the disturbed and built out nature of the project area, no paleontological resources are expected to occur on-site. Notwithstanding, as the project would require excavation to a maximum depth of approximately 26 feet below existing ground surface, there is potential to uncover previously undiscovered paleontological resources during earth removal or ground-disturbing activities. Municipal Code Section 153.630, *Identification, Documentation, and Management of Archaeological, Native American, and Paleontological Resources*, outlines the procedures and criteria for the identification, documentation, and management of archaeological, Native American, and paleontological cultural resources. Should project excavation encounter paleontological resources on-site during ground-disturbing activities, the project Applicant would be required to retain a qualified paleontologist as defined by the Society of Vertebrate Paleontology. The qualified paleontologist would be required to prepare and submit a report including a statement on the significance of the discovery and recommended a course of action in accordance to Municipal Code Section 153.630(G), *On-site monitoring and mitigation enforcement (Paleontology)*. Upon compliance with the recommended actions included in Municipal Code Section 153.630, impacts to paleontological resources would be reduced to less than significant levels.

***Mitigation Measures*:** No mitigation measures are required.

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4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	

GLOBAL CLIMATE CHANGE

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 418 million metric tons of carbon dioxide equivalent ($MTCO_2e$) per year.[1] Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which increases the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of carbon dioxide (CO_2), CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of August 2021, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 419 ppm.[2]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent (CO_2e)[3] concentration is required to keep global mean warming below two degrees Celsius (°C), which in turn is assumed to be necessary to avoid dangerous climate change.

[1] California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2019,* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf, accessed August 23, 2021.

[2] Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed August 23, 2021.

[3] Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

REGULATORY FRAMEWORK

State

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Senate Bill 32. Signed into law on September 2016, Senate Bill (SB) 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

California Building Energy Efficiency Standards (Title 24). The *2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. 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. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards.

CARB Scoping Plan. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California implement; to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million MT CO_2e under a business as usual (BAU)[4] scenario. This is a reduction of 42 million MT CO_2e, or almost ten percent,

[4] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2021 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under the 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan.

Local

2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy

On September 3, 2020, the Regional Council of the Southern California Association of Governments (SCAG) formally adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are to:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the State-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

City of San Gabriel Energy Action Plan

The San Gabriel City Council adopted the City's first *Energy Action Plan* (EAP) on November 20, 2012. The EAP was developed in partnership with the San Gabriel Valley Council of Governments (SGVCOG) and Southern California Edison (SCE). The intent of the EAP is to:

- Make it easier for residents and businesses to finance energy efficient improvements and save money on energy bills;
- Provide a roadmap for reducing the City's energy bills;
- Reduce the City and community's impact on the environment;
- Provide the City with critical baseline data that the State requires for cities to address greenhouse gas emissions;
- Enable the City to receive additional grants; and
- Serve as a foundation for future planning efforts such as general plan updates, climate action plans, housing element updates, and zoning code updates, among others.

Threshold of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the content of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[5,6] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[7]

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, the SCAQMD, California Air Resources Board (CARB), or any other State or regional agency has yet to adopt a

[5] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed August 30, 2021.

[6] State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April 13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf, accessed August 30, 2021.

[7] 4 CCR Section 15064(h)(3).

numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

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?

***Less Than Significant Impact*.**

PROJECT GREENHOUSE GAS EMISSIONS

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO_2, N_2O, and CH_4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. 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 most recent version of the California Emissions Estimator Model (CalEEMod), version 2020.4.0, was used to calculate direct and indirect project-related GHG emissions. The CalEEMod model was conducted to calculate the long-term emissions from project-related operational activities. CalEEMod relies upon trip data from the *Proposed 205 E. Valley Boulevard Residential Mixed-Use Project Traffic Letter* (Trip Generation/VMT Memo*)* prepared by KOA Corporation (dated August 18, 2021), and project-specific land use data to calculate emissions. Table 4.8-1, *Projected Annual Greenhouse Gas Emissions*, presents the estimated CO_2, N_2O, and CH_4 emissions from the proposed project. CalEEMod outputs are contained within Appendix B, *AQ/GHG/Energy Data*.

Table 4.8-1
Projected Annual Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e[2,3]
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[1]	
Direct Emissions						
Construction (amortized over 30 years)	20.53	0.02	0.54	<0.01	0.27	20.89
Area Source	11.63	<0.01	0.02	<0.01	0.06	11.70
Mobile Source	479.76	0.03	0.84	0.02	6.30	486.85
Total Direct Emissions[2]	*511.91*	*0.06*	*1.39*	*0.02*	*6.63*	*519.45*
Indirect Emissions						
Energy	58.31	<0.01	0.06	<0.01	0.27	58.64
Water Demand	15.57	0.14	3.40	<0.01	0.99	19.93
Solid Waste	6.33	0.37	9.30	0.00	0.00	15.67
Total Indirect Emissions[2]	*80.20*	*0.51*	*12.76*	*<0.01*	*1.25*	*94.25*
Total Project-Related Emissions[2]	***613.70 $MTCO_2e$/yr***					

Notes: $MTCO_2e$/yr = metric tons of carbon dioxide equivalent per year
1. Emissions calculated using the CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. Totals may be slightly off due to rounding.
3. Carbon dioxide equivalent values calculated using the U.S. Environmental Protection Agency, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed August 25, 2021.
4. Project would incorporate design features that were modeled in CalEEMod, including on-site renewable energy generation, energy efficient appliances, all-electric landscaping equipment, water-efficient irrigation system, and drought-tolerant landscaping.

Refer to Appendix B for assumptions used in this analysis.

Reduced Greenhouse Gas Emissions

The proposed project includes design features that would reduce project-related GHG emissions. The project would install water-efficiency irrigation systems and include drought-tolerant landscaping. Additionally, the proposed project would include recycling and composting services, which would reduce GHG emissions from solid waste by 10 to 40 percent**.** As a conservative analysis, a 10 percent solid waste diversion rate was modeled in CalEEMod. Furthermore, the project would comply with the most current Title 24 standards. In addition, the project would generate approximately 315,300 kilowatt hours (kWh) per year of renewable energy on-site, install solar ready roofs, and energy-efficient appliances.

Direct Project-Related Sources of Greenhouse Gases

- Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[8] As shown in Table 4.8-1, the proposed project would result in construction emissions of approximately 626.84 $MTCO_2e$, which represents 20.89 $MTCO_2e$/yr when amortized over 30 years.
- Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. The primary use of natural gas producing area source emissions by the project would be for consumer

[8] The project lifetime is based on the SCAQMD standard 30-year assumption (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, Wednesday, August 26, 2009*, 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 September 7, 2021).

products, architectural coating, hearth, and landscaping. As noted in Table 4.8-1, the proposed project would result in 11.70 $MTCO_2e$/yr of area source GHG emissions.

- Mobile Source. CalEEMod relies upon trip data within the Trip Generation/VMT Memo and project-specific land use data to calculate mobile source emissions. The project would directly result in 486.85 $MTCO_2e$/yr of mobile source-generated GHG emissions; refer to Table 4.8-1.

Indirect Project-Related Sources of Greenhouse Gases

- Energy Consumption. Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity would be provided to the project site by SCE. The project would indirectly result in an additional 58.64 $MTCO_2e$/yr due to energy consumption; refer to Table 4.8-1.
- Water Demand. The project operations would result in an increased demand of approximately 6.53 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 19.93 $MTCO_2e$/yr; refer to Table 4.8-1.
- Solid Waste. Solid waste associated with operations of the proposed project would result in 15.67 $MTCO_2e$/yr; refer to Table 4.8-1.

As shown in Table 4.8-1, the proposed project-related GHG emissions from direct and indirect sources combined would total 613.70 $MTCO_2e$/yr.

CONSISTENCY WITH APPLICABLE GHG PLANS, POLICIES, OR REGULATIONS

The GHG plan consistency for the project is based on the project's consistency with the 2020-2045 RTP/SCS, 2022 Scoping Plan, and the City's EAP. Thus, the GHG plan consistency for this project is based off the project's consistency with the 2020-2045 RTP/SCS and the CARB's 2022 Scoping Plan. The 2020-2045 RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2020-2045 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes.

Project Consistency with the SCAG 2020-2045 RTP/SCS

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects; and different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The 2020-2045 RTP/SCS is intended to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional VMT and GHG reduction goals, as required by the State. Table 4.8-2, *Project Consistency with the 2020-2045 RTP/SCS*, shows the project's consistency with these five strategies found within the 2020-2045 RTP/SCS. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.8-2
Project Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** Transit Priority Areas (TPAs) are defined in the 0.5-mile radius around an existing or planned major transit stop or an existing stop along a High Quality Transit Corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours. A High Quality Transit Area (HQTA) is an area within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The project is an infill development located in an HQTA. The closest bus stop is approximately 500 feet away from the project site and serviced by Metro (Line 76 and Routes 487/489). Further, the project site is located within a pedestrian-oriented area given that it fronts existing sidewalks to the east and south. Furthermore, the project site is located in an urbanized area and within walking and biking distance of existing commercial developments. Additionally, the project would provide bicycle parking spaces and electric vehicle (EV) parking spaces in accordance with CALGreen Code. Therefore, the project would focus growth near destinations and mobility options.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.**	**Consistent.** The project is a mixed-use development with residential and commercial components. The infill development is located in a high density area of San Gabriel. Furthermore, the project would provide a mix of uses (residential and commercial) in an area with existing commercial and employment centers. As such, the proposed project would help increase housing while promoting mixed-use development within a compact area with other employment-generating uses. As such, the project would be consistent with this strategy.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy,	**HQTA, TPAs, NMA, Livable Corridors.**	**Consistent.** Potential development within the project area would be required to comply with all applicable Title 24 and CALGreen building codes at the time of construction. These building codes would require EV charging stations, designated EV parking, as well as bicycle parking and storage. Furthermore, the Title 24 code requires photovoltaic solar panels on residential development. The project would install solar-ready roofs and generate approximately 315,300 kWh per year of renewable energy on-site. Therefore, the proposed development would leverage technology innovations and help the City, County, and State meet its GHG reduction goals. The

Table 4.8-2 [cont'd]
Project Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
hydrogen fuel cell power storage and power generation		project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** As previously discussed, the proposed project would be located in close proximity to an existing Metro bus stop, which would promote alternative modes of transportation. Further, the project would comply with sustainable practices included in the 2022 Title 24 standards and CALGreen Code, such as installation of EV charging stations, bicycle parking and storage, solar-ready roofs, on-site renewable energy generation, water-efficient irrigation, and drought-tolerant landscaping. Thus, the project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Green Region, Urban Greening, Greenbelts and Community Separators.**	**Consistent.** The proposed project is an infill development in an urbanized area and therefore, would not interfere with regional wildlife connectivity or consume existing agricultural land. The project would be required to comply with all applicable Title 24 and CALGreen Code measures, which would help reduce energy consumption and reduce GHG emissions. Thus, the project would support efficient development that reduces energy consumption and GHG emissions. The project would be consistent with this reduction strategy.

Source: Southern California Association of Governments, *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

Project Consistency with the 2022 Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Table 4.8-3, *Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors*, evaluates the project's consistency with applicable reduction actions and strategies by emission source category to determine how the project would be consistent with or exceed reduction actions and strategies outlined in the 2022 Scoping Plan.

Table 4.8-3
Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	**Consistent**. The project is located near existing commercial plazas. The closest bus stop is approximately 500 feet away from the project site and serviced by Metro (Line 76 and Routes 487/489). Further, the project site is located within a pedestrian-oriented area given that it fronts existing sidewalks to the east and south. Additionally, the project would provide bicycle parking and electric vehicle charging station which would promote alternative mode of transportation and reduce VMT. Therefore, the project would focus growth near destinations and mobility options that would reduce VMT. As such, the project would be consistent with the action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed Statewide by 2030.	**Consistent.** The project is expected to consist of natural gas heating and/or cooking on-site. The City has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if adopted, the project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. Furthermore, the project would install energy efficient appliances and all electric landscape equipment. As such, the project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75 percent of organic waste from landfills by 2025.	**Consistent**. The project would implement a recycling program per Assembly Bill 341 to help meet California's recycling goal. As such, the project would be consistent with the action.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

Project Consistency with the City's Energy Action Plan

As described in Table 4.6-2, *Energy Action Plan Consistency*, of Section 4.6, *Energy*, the project would comply with the applicable goals identified in the City's EAP. The EAP contains energy efficient goals and policies that would help implement energy efficient measures and would subsequently reduce energy consumption within the City. These energy reduction measures and goals would also help reduce the project's GHG emissions. Compliance with Title 24 and the CALGreen Code would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water-efficient fixtures and EV charging infrastructure, which is consistent with the goals and

policies of the EAP. Additionally, per the RPS, the project would utilize electricity provided by SCE that is required to achieve 60 percent renewable energy by 2030. Therefore, the proposed project would be consistent with the EAP goals to reduce energy consumption and GHG emissions.

CONCLUSION

In summary, the plan consistency analyses provided above demonstrates that the project complies with or exceeds the plans, policies, regulations in the 2020-2045 RTP/SCS, 2022 Scoping Plan, and the City's EAP. Thus, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project-specific 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

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✓
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 of loss, injury or death involving wildland fires?				✓

This section is primarily based upon the following technical studies (refer to Appendix D, *Hazardous Materials Documentation*):

- *Update Phase I Environmental Site Assessment, 205 East Valley Blvd (APN 536-018-002 & 020), San Gabriel, CA 91776* (Phase I ESA), prepared by MTC Engineering, Inc. (MTC), dated November 15, 2017; and
- *Phase II Environmental Site Investigation, 205 East Valley Blvd (APN 536-018-002 & 020), San Gabriel, CA 91776* (Phase II ESA), prepared by MTC Engineering, Inc., dated November 17, 2017.

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

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials can occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

CONSTRUCTION

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction equipment and/or materials (i.e., oil, diesel fuel, and transmission fluids). However, these activities would be short-term in nature, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All project construction activities would be required to demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Therefore, impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

OPERATIONS

Hazardous materials are not typically associated with commercial or residential uses. Anticipated hazardous materials use during project operations may include minor cleaning products and the occasional use of pesticides and herbicides for landscape maintenance. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner, and would minimize the potential for safety impacts to occur. As such, impacts concerning the routine transport, use, or disposal of hazardous materials during project operations 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. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. Human exposure of contaminated soil, soil vapor, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

Construction

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluids used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law.

Construction activities could also result in accidental conditions involving existing on-site contamination. The following analysis considers current and past uses of the project site and its vicinity, which may have resulted in existing on-site soil, soil vapor, and/or groundwater contamination.

Historic Buildings

Based on the Phase I ESA, the project site was occupied by residential dwellings prior to 1952. A commercial building and associated parking area occupied the southwestern portion of the site from prior to 1964 to at least 1994. All on-site buildings were demolished prior to 2002, and the site has remained vacant since then, similar to existing condition.

Lead-based paint was commonly used for buildings constructed prior to circa 1950s. As such, the Phase I ESA determined that there is a potential for elevated concentration of lead to be present in on-site soils.

Swinerton Builders Past Construction Activities

According to the Phase I ESA, Swinerton Builders (contractor responsible for the construction of the adjacent Sheraton Hotel) occupied the project site's main yard for construction equipment/material storage, and utilized a trailer office in the southwestern portion of the site as a construction office from 2000 to the end of 2017. According to the Phase I ESA, a prior study had noted the presence of an open-mouth (seemingly self-made) wood container with a horizontally lying 55-gallon form oil drum shelved on its top for dispensing form oil in the northwestern corner of the site, and a second 55-gallon drum containing form oil on the asphalt-paved ground next to the open-mouth wood container. The prior study had observed certain staining on the asphalt pavement around the open-mouth wood container. However, as form oil is not considered a hazardous material (used to remove forms after concrete has cured), the Phase I ESA determined that such staining is not anticipated to induce significant impacts to the subsurface environment. The Phase I ESA also verified that the form oil drums previously observed had been removed off-site during a site visit on November 16, 2017, and no substantial form oil stains were present during a subsequent visit on January 9, 2022. As such, the Phase I ESA concluded that there is a low likelihood that the site has been adversely impacted from on-site contamination sources.

Regional Contaminated Groundwater

A contaminated site is generally considered a Superfund site if the Federal government is, or plans to be, involved in cleanup efforts. According to the Phase I ESA, the project site is located within the San Gabriel Valley Groundwater Basin, which has been classified by the United States Environmental Protection Agency (EPA) as a National Priority List (NPL) Cleanup site. In 1984, the discovery of widespread groundwater contamination prompted the EPA to add four areas in the San Gabriel Valley (Areas 1 through 4) to the NPL of the hazardous waste sites that are eligible for cleanup under the Superfund process. The four San Gabriel Valley Superfund sites include areas of groundwater contamination underlying approximately 30 square miles of the 170-square mile San Gabriel Valley area. Regional groundwater contamination is a result of decades of improper handling and disposal practices that released industrial solvents and volatile organic compounds (VOCs) into the soil and groundwater. Contaminants of concern within San Gabriel Valley include tetrachloroethene (PCE) and trichloroethene (TCE).

Based on the Phase I ESA, the project site is not located on any plumes of dissolved phase VOCs. Further, according to the Phase I ESA, depth to groundwater in the site vicinity is at least 50 feet below ground surface. The proposed subterranean parking garage would require excavation to a maximum depth of approximately 26 feet below ground surface. As such, the Phase I ESA concluded that health risk induced by contaminated groundwater is low. Based on the lack of human health risks due to the depth to groundwater and the nature of the San Gabriel Valley (Area 3) contaminant plume, it is not anticipated that regional groundwater plume would present a significant vapor encroachment condition to the project site.

Listed Off-Site Properties

Based on the Phase I ESA, one site (123 East Valley Boulevard) located within 300 feet of the project site has been historically listed for soil contamination. The potential contaminants of concern were TCE and PCE. As the project site is located approximately 100 feet higher in elevation to the 123 East Valley Boulevard property, the Phase I ESA concluded that the possibility in which the contaminants of concern (TCE and PCE) migrate to the project site via soil contamination is very low.

According to a Department of Toxic Substances (DTSC) record search, there are three listed cleanup sites located within one mile of the project site.[1] All three sites are located at a distance (from 2,125 feet to 4,626 feet) from the project site, and are underlain by similar groundwater level as the project site (i.e., cross-gradient) or at downstream areas (i.e., down-gradient) with no potential to significantly affect the project site.

According to the State Water Resources Control Board (SWRCB), there are 14 listed cleanup sites within one mile of the project site.[2] Eleven of the 14 sites are closed, which indicates that that they have undergone investigations or remediation and are no longer of environmental concern. The remaining three sites are open but inactive. Similar to the sites listed by DTSC, these three sites are underlain by similar groundwater level as the project site or at downstream areas with no potential to significantly affect the project site.

Further, a record search of the Nationwide Environmental Title Research, LLC (NETR) indicated 13 listed sites are located within 0.5-mile of the project site.[3] Ten of the 13 sites are closed, and the remaining three sites are open but inactive. The three sites are located in the residential areas to the north of the site. Based on groundwater flow and the residential uses to the north, the potential for materials of environmental concern to flow towards the site from the residential areas would be very low.

Additionally, it is acknowledged that there is no record of underground tanks, industrial waste, or other environmental conditions of concerns recorded by the Los Angeles County Public Works Environmental Programs Division, Los Angeles County Fire Department, or the City within the project vicinity.[4] As such, the potential for listed off-site properties to significantly impact soil, soil gas, or groundwater at the project site is low.

Potential Soil and Soil Gas Contamination

Although potential for previous uses of the site and reported off-site contamination to adversely impact on-site soil is low, the Phase I ESA recommended subsurface investigation be conducted to identify any potential environmental issues for contaminants of concern (i.e., TCE, PCE, and lead) in on-site soils. As such, subsurface investigations were conducted as part of the Phase II ESA to evaluate potential impacts to soil and soil gas on-site. Specifically, two soil borings were drilled in the northwest and southeast portions of the site. Results from collected soil samples indicated concentrations of VOCs and lead below regulatory screening levels for residential and commercial uses. As such, the Phase II ESA concluded that no further environmental investigation is required for on-site soils. Impacts in regard to on-site soil and soil gas contamination would be less than significant in this regard.

Operations

Refer to Response 4.9(a) for a description of impacts related to proposed operations at the project site. Upon adherence to existing regulations related to hazards and hazardous materials safety, impacts pertaining to the potential for accidental conditions during project operations would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

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

***Less Than Significant Impact*.** The closest school to the project site is the McKinley Elementary School, located approximately 0.21-mile to the northwest of the project site at 1425 Manley Drive. Although the project site is located

1 MTC Engineering, Inc., *Supplemental Responses to Roux Phase I & II Reports' Reviews, Phase I Environmental Site Assessment & Phase II Environmental Site Investigation, 205 East Valley Boulevard, San Gabriel, California*, January 12, 2022.
2 Ibid.
3 Ibid.
4 Ibid.

within 0.25-mile of an existing or proposed school, it is concluded that less than significant impacts as a result from current and past uses of the project site and its vicinity would occur during project construction and operation; refer to Responses 4.19(a) and 4.19(b). Further, hazardous materials are not typically associated with commercial or residential uses, and the project would be required to comply with Federal, State, and local laws and regulations regarding the handling and transport of hazardous materials. For these reasons, project implementation is not anticipated to result in adverse impacts in regard to emitting hazardous emissions or handling hazardous materials within 0.25-mile of an existing school. Impacts would be less than significant.

***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?

Less Than Significant Impact. Government Code Section 65962.5 requires the DTSC and SWRCB to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

Based on the CalEPA's Cortese listing, the project site is not listed pursuant to Government Code Section 65962.5.[5] As such, no impacts would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

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

No Impact. The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue in the City of El Monte, approximately 3.4 miles to the east. Therefore, project implementation would not introduce a safety hazard for people residing or working in the project area. 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 Impact With Mitigation Incorporated. According to the General Plan, the City's *Multi-Hazard Functional Plan* establishes tactics to address local and regional hazards. Since 1989, the City has operated an Emergency Operation Center (EOC) located at 1303 South Del Mar Avenue to function as the central command post in the event of a disaster.

[5] California Environmental Protection Agency, *Cortese List Data Resources*, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed September 1, 2021.

As indicated in Section 4.17, *Transportation*, the project does not include changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways. Further, should partial or full lane closures be required during construction activities, implementation of a Traffic Management Plan (TMP) would minimize congestion and ensure safe travel, including emergency access in the project vicinity (Mitigation Measure TRA-1); refer to Response 4.18(d). As a small-scale mixed-use project, project implementation would not physically interfere with an adopted emergency response plan or emergency evacuation plan. With implementation of Mitigation Measure TRA-1, impacts would be reduced to less than significant levels .

Mitigation Measures: Refer to Mitigation Measure TRA-1.

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

No Impact. According to the General Plan Public and Environmental Safety Element, there are no areas subject to wildland fires within San Gabriel.[6] The project site consists of and is surrounded by urban/developed land and no areas of wildland are present in the project vicinity. Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[6] City of San Gabriel, *The Comprehensive General Plan of the City of San Gabriel*, Figure 5-1, Safety Issues Analysis, 2004.

4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
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:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) 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?			✓	
4) 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?				✓

This section is primarily based on the *Site Hydrology and Hydraulics Report for Valley Mixed Use Project, 205 E. Valley Boulevard, San Gabriel, CA* (Hydrology Report), prepared by VCA Engineers, Inc., dated August 7, 2021; refer to Appendix E, *Hydrology Report*.

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

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharge. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCBs) to preserve, protect, enhance, and restore water quality. The City of San Gabriel is within the jurisdiction of the Los Angeles RWQCB.

CONSTRUCTION

The proposed project may result in water quality impacts during short-term construction activities. Project-related grading activities would expose soils to wind and water erosion. As construction activities would disturb less than one acre, the project would not be required to obtain coverage under the NPDES Construction General Permit. However,

the Los Angeles RWQCB requires all municipalities within its jurisdiction, including the City, to comply with the water quality objectives in its Stormwater Quality Management Plan (SQMP). The SQMP is designed to ensure that stormwater produced from a proposed development does not exceed the limitation of any receiving waters and water quality standards. Under the SQMP, development projects within the County of Los Angeles are required to obtain permits for water pollution generated by stormwater. These permits, known as Municipal Separate Storm Sewer Systems (MS4) permits, are part of the NPDES program.

The project would be required to comply with applicable regulations from Municipal Code Chapter 53, *Stormwater and Urban Runoff Pollution Prevention*. To further minimize the potential for accidental release of hazardous pollutant during project construction, the transport, use, and disposal of construction materials would be required to adhere to applicable State and local standards and regulations for handling, storage, and disposal of hazardous substances; refer to Section 4.9, *Hazards and Hazardous Materials*. Compliance with such measures would prevent such substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality.

Following conformance with the City's SQMP and implementation of BMPs, the project's short-term impacts to water quality and waste discharge requirements would be less than significant.

OPERATIONS

According to the Hydrology Report, the Los Angeles RWQCB requires the project site to be designed with the capacity to handle a 25-year, 24-hour discharge storm event. Additionally, the Municipal Code requires drainage collected on-site to be treated or controlled so that downstream drainage patterns are not overtaxed by the 25-year storm event. Pursuant to Municipal Code Section 53.12, *Control of Pollutants from New Developments/Redevelopment Projects*, the project should be evaluated for its potential to discharge pollutants to the MS4 based in its intended land use and other considerations prior to initiation of construction activities. Once a development or redevelopment project has been evaluated, the City requires appropriate BMPs to be installed during construction for implementation following project completion.

The project site is designed to sheet flow to on-site drain inlets throughout the site. All collected runoff would be conveyed to various low impact development (LID) biofiltration planter boxes, filtered through the soil media at a rate of 12 inches per hour, and discharged through curb drains along the face of the sidewalks. Runoff from the first floor would be pumped to the LID biofiltration planters on the second floor using a sump pump. The LID planters are sized to collect and filter runoff volumes generated by the 85th percentile design storm. Excess runoff (exceeding the 85th percentile storm event) would be collected in atrium drains and discharged through curb drains along South Palm Avenue.

Table 4.10-1, *Existing and Proposed Stormwater Discharge*, details the stormwater runoff flow rates and volumes under existing and post-development conditions. As shown in Table 4.10-1, the proposed project would reduce runoff volume and flow rate on-site compared to existing condition.

Table 4.10-1
Existing and Proposed Stormwater Discharge

Flow Rate	25-Year Storm (cubic feet per second)	85th Percentile Storm (cubic feet per second)	Actual (cubic feet per second)
Existing Condition	2.17	—	2.17
Proposed Project Condition	2.15	0.16	1.59
Change	*-0.02*	—	*-0.58*

Table 4.10-1 [cont'd]
Existing and Proposed Stormwater Discharge

Runoff Volume	25-Year Storm (cubic feet)	85th Percentile Storm (cubic feet)	Actual (cubic feet)
Existing Condition	12,857	—	12,857
Proposed Project Condition	12,218	1,879	10,339
Change	*-639*	—	*-2,518*

Source: VCA Engineers, Inc., *Site Hydrology and Hydraulics Report for Valley Mixed Use Project, 205 E. Valley Boulevard, San Gabriel, CA*, August 7, 2021; refer to Appendix E.

As a mixed-use development with 51 dwelling units and ground-floor commercial use, it is not anticipated that the project would become a point source generator of water pollutants. Additionally, the project would be required to comply with the Los Angeles RWQCB's water quality standards in the SQMP and regulations outlined in Municipal Code Chapter 53, and specifically, Section 53.07, *Control of Pollutants from Commercial Facilities*. Implementation of the aforementioned BMP (i.e., the installation of LID biofiltration planters) and compliance with existing regulations would ensure the project does not violate any water quality standards or waste discharge requirements. Therefore, long-term water quality impacts would be less than significant in this regard.

***Mitigation Measures*:** No mitigation measures are required.

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

***No Impact*.** The project is located within the San Gabriel Valley groundwater basin. The project site is currently developed as an asphalt-paved surface parking lot and is not currently used for groundwater extraction or groundwater recharge purposes. As detailed in the Hydrology Report, development of the project would not result in an increase in impervious surfaces compared to existing conditions. Rather, the proposed project would decrease impervious areas by approximately 6.38 percent; refer to Table 4.10-2, *Existing and Proposed Drainage Conditions*.

Table 4.10-2
Existing and Proposed Drainage Conditions

	Pervious Area (acre)	Impervious Area (acre)	Percentage of Pervious Area	Percentage of Impervious Area
Existing Condition	0.01	0.68	2 %	98%
Proposed Project Condition	0.06	0.63	8.38 %	91.62%
Changes	*+0.05*	*- 0.05*	*+ 6.38 %*	*- 6.38%*

Source: VCA Engineers, Inc., *Site Hydrology and Hydraulics Report for Valley Mixed Use Project, 205 E. Valley Boulevard, San Gabriel, CA*, August 7, 2021; refer to Appendix E.

Further, as detailed in Response 4.19(b), the San Gabriel County Water District (SGCWD) would have adequate supply from its groundwater sources in an average, single-dry, and multiple dry year sequence to meet the water demands of the proposed development. As such, development of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management. No impacts would occur in this regard.

***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:

1) Result in substantial erosion or siltation on- or off-site?

***Less Than Significant Impact*.** The proposed project would not substantially alter the existing drainage pattern of the site or project area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces. The project site is located within an urbanized area and is predominantly paved with asphalt. Currently, stormwater from the project site sheet flows in a southeasterly direction onto South Palm Avenue and East Valley Boulevard. It is noted that there are no existing catch basins or storm drain lines on-site or in the immediate vicinity. Soil disturbance would temporarily occur during project construction due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, and grading. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project site. However, as stated above, the project would be subject to compliance with the requirements set forth in the NPDES's MS4 permit, Los Angeles RWQCB's SQMP and Municipal Code; refer to Response 4.10(a). Compliance with existing regulations would reduce the volume of sediment-laden runoff discharging from the site during project construction, and less than significant impact would occur in this regard.

Upon project completion, runoff would be conveyed to various LID biofiltration planter boxes, filtered through the soil media at a rate of 12 inches per hour, and discharged through curb drains along the face of adjacent sidewalks. The LID planters are sized to collect and filter runoff volumes generated by the 85th percentile design storm. Excess runoff exceeding the 85th percentile storm event would be collected in atrium drains and discharged through curb drains along South Palm Avenue. As a result, the proposed project would reduce runoff volume and flow rate on-site compared to existing condition; refer to Table 4.10-1. Further, the project would not include large areas of exposed soils that would be subject to runoff as the site would be mostly paved and developed with LID biofiltration planters. In addition, as discussed in Response 4.10(a), the project would be subject to existing regulatory requirements that address long-term water quality impacts, including erosion or siltation. As such, implementation of the aforementioned BMP (the installation of LID biofiltration planters) and compliance with existing regulations would ensure that impacts in this regard would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

2) 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)(1), the proposed project would not substantially alter the existing drainage pattern of the site or project area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces. As indicated in Tables 4.10-1 and 4.10-2, the project would decrease runoff volume, flow rate, and impervious surface areas compared to existing conditions. According to the Hydrology Report, all on-site runoff would be adequately accommodated by on-site drain inlets and biofiltration boxes and would discharge through curb drains along the face of adjacent sidewalks. Further, the proposed LID planters are sized to collect and filter runoff volumes generated by the 85th percentile storm event. As such, project implementation would not result in on- or off-site flooding and impacts in this regard would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

3) 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*.** Refer to Responses 4.10(a) and 4.10(c)(2). Stormwater runoff from the project site would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff. Less than significant impacts would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

4) Impede or redirect flood flows?

***No Impact*.** Refer to Responses 4.10(c)(2) and 4.10(d).

***Mitigation Measures*:** No mitigation measures are required.

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

***No Impact*.**

Flood Hazard

According to the Federal Emergency Management Agency's *National Flood Hazard Layer Viewer*, the project site is not located within a 100-year flood hazard area.[1] No impacts would occur in this regard.

Tsunami

A tsunami is a great sea wave, commonly referred to as a tidal 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 20 miles inland from the Pacific Ocean and thus, is located at a sufficient distance so as not to be subject to tsunami impacts. No impacts would occur in this regard.

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 site is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche. No impacts would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

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

***No Impact*.** 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, including the City, and is the basis for the Los Angeles RWQCB's regulatory programs.

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 (GSPs) or prepare an alternative to a groundwater sustainability plan. The project is located within the San Gabriel Valley

[1] Federal Emergency Management Agency, *National Flood Hazard Layer Viewer*, https://www.fema.gov/national-flood-hazard-layer-nfhl, accessed September 9, 2021.

groundwater basin, which is designated as a Very Low priority basin.[2] Therefore, there is no groundwater sustainability plan established for the basin. However, 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. The SNMP management strategies developed by local water entities in the San Gabriel Valley 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 strategies are applied in conjunction with existing water quality protection measures in each groundwater basin area. Implementation of the proposed project would not conflict with the SNMP for the San Gabriel Valley Basin and as indicated in Response 4.10(b), the project would not substantially deplete groundwater supplies or interfere with groundwater recharge. As a result, the proposed project is not anticipated to conflict with or obstruct with the groundwater basin and SNMP management strategies identified in the Basin Plan. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

[2] California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed September 9, 2021.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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. Factors that could physically divide a community include, but are not limited to the:

- Construction of major highways or roadways;
- Construction of storm channels;
- Closing bridges or roadways; and
- Construction of utility transmission lines.

The key factor with respect to this threshold is the potential to create physical barriers that change the connectivity between areas of a community to the extent that persons are separated from other areas of the community. The project does not propose to construct any major highways or roadways, storm channels, bridges or roadways, or utility transmission lines that would physically divide a community. The project site is a vacant surface parking lot currently fenced off on all sides. The closest established community is the adjacent multi-family residential development to the north. The proposed project would not physically divide the existing residential community nor change the connectivity between the residential community and the surrounding residential and commercial uses. As such, no impacts would occur in this regard.

***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.

GENERAL PLAN CONSISTENCY

Based on the General Plan, the project site is designated Commercial Specific Plan and located within the *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan* (Valley Boulevard Specific Plan [Specific Plan]) area. The Commercial Specific Plan designation applies to two areas within the City, each of which has a distinct character and for which special land use and development strategies are needed to capitalize on the special advantages inherent in each of these specific plan areas.

The General Plan identifies various key land use issues in the City and include goals, targets, and actions to address such issues. Table 4.11-1, *General Plan Land Use Consistency Analysis*, provides a consistency analysis of the proposed project and relevant General Plan Land Use Element goals regarding land use. As indicated in Table 4.11-

1, the proposed mixed-use development would be consistent with the General Plan, and impacts would be less than significant in this regard.

Table 4.11-1
General Plan Land Use Consistency Analysis

Relevant Policies	Consistency Analysis
Goal 1.5: Support new development that efficiently and effectively combines residential and commercial uses.	Consistent. Project implementation would develop 51 apartment units and 10,542 square feet of commercial uses. The ground-level commercial uses would include general commercial/office use, of which 1,800 square feet may be allocated for a coffee shop along East Valley Boulevard. The proposed mixed-use development would be street-facing and surrounded by other residential and commercial uses on all sides. As such, project implementation would support new development that efficiently and effectively combines residential and commercial uses. The project would be consistent with Land Use Goal 1.5.
Goal 1.6: Ensure that new development is appropriately and sensitively buffered from its neighbors.	Consistent. Surrounding land uses include multi-family residential uses to the north, commercial uses to the east and south, and commercial and institutional uses to the west. As stated, the project is designed to include ground-level, street-facing commercial uses adjacent to other existing commercial uses to the east, south, and west of the site. The project site is adjacent to residential uses to the north and would be buffered from its neighbors with the proposed Northside Courtyard. The Northside Courtyard would include ornamental landscaping and screening trees that buffer the proposed development from the adjacent residential uses. The project's rear yard setback would also comply with the Municipal Code requirements for MU-T zones. As a result, project implementation would be appropriately and sensitively buffered from its neighbors. The project would be consistent with Land Use Goal 1.6.
Goal 1.9: Use redevelopment judiciously to promote economic growth, eliminate blight, and build affordable housing.	Consistent. The project site is currently developed as an asphalt-paved surface parking lot. The proposed infill, mixed-use development would revitalize the visual character and quality of the project area through redevelopment, reversing the spread of blight and deterioration and improving community pride and safety; refer to Section 4.1, *Aesthetics*. Project implementation would also provide a positive contribution to the maintenance and expansion of the City's economic base as the proposed development would increase the City's business license taxes, property taxes, and sales taxes. Further, the project's commercial component would benefit the local economy by providing jobs and encouraging the investment of local resources in local businesses. Although the project does not involve an affordable housing component, the proposed project is an opportunity to redevelop the site in a manner that would promote economic growth and eliminate blight. Thus, the project would be consistent with Land Use Goal 1.9.

Table 4.11-1 [cont'd]
General Plan Land Use Consistency Analysis

Relevant Policies	Consistency Analysis
Goal 1.10: Cooperate with all our neighbors to ensure that future development along our common borders is compatible with our neighbors and vice-versa.	Consistent. Refer to response to Land Use Goal 1.6.
Goal 1.12: Transform Valley Boulevard into a vibrant, functional, and quality environment.	Consistent. The proposed infill development would redevelop the project site from a vacant surface parking lot into a mixed-use development with ground-level commercial space and residential uses above. The project site fronts East Valley Boulevard and would help transform the underutilized site into a more complementary use. The project also proposes to develop a Main Entrance Courtyard along East Valley Boulevard with granite pavers, colored accent tiles, street trees, planters with drought-tolerant grasses, shrubs and groundcover, and bicycle racks. Thus, the project would contribute towards transforming Valley Boulevard into a vibrant, functional, and quality environment compared to existing conditions.

Source: City of San Gabriel, *Comprehensive General Plan of the City of San Gabriel, California*, Chapter 1 – Land Use, adopted May 18, 2004.

SPECIFIC PLAN CONSISTENCY

The project site is zoned Mixed-Use Transit Oriented Development (MU-T) under the Specific Plan, which allows for a wide variety of uses, including retail, office, residential, public and service, hotel, and live/work units that support the principals for sustainable development (i.e., transit-oriented development) along East Valley Boulevard. The Specific Plan also specifies subareas that offer opportunities for higher intensity transit-oriented development. Accordingly, the project site is located within Subarea 1-D: Northeast Corner of Valley Boulevard and Del Mar Avenue. The Specific Plan includes the following objectives to promote sustainable development practices in the Specific Plan area:

1. Reduce dependence upon fossil fuels and extracted underground metals and materials;
2. Reduce dependence on chemicals and other manufactured substances that can accumulate in nature;
3. Reduce dependence on activities that harm life-sustaining ecosystems; and
4. Meet the hierarchy of present and future human needs fairly and efficiently.

In order to achieve these objectives, the Specific Plan includes specific objectives, policies, and development standards to address sustainability in terms of land use development, building and site design, transportation, infrastructure, and streetscape. Table 4.11-2, *Valley Boulevard Specific Plan Consistency Analysis*, provides a consistency analysis of the proposed project and relevant Specific Plan policies regarding land use development. As indicated in Table 4.11-2, the proposed project would be consistent with the Specific Plan policies, and impacts would be less than significant in this regard.

Table 4.11-2
Valley Boulevard Specific Plan Consistency Analysis

Relevant Policies	Consistency Analysis
Land Use Strategy 1: Concentrate Development in Proximity to Transit Stops and Corridors	
1.1 Redevelop and intensify properties in proximity to the primary transit stops with the highest intensities of development in the Valley Boulevard Neighborhoods, to focus neighborhood identity and activity and support transit use.	Consistent. The project proposes to construct a mixed-use development with commercial and residential uses on a currently underutilized site developed with a surface parking lot. The infill development consists of 51 apartment units and approximately 10,542 square feet of ground-level commercial use. The project site is located approximately 300 feet east of an existing bus stop for Metro Bus Route 76 on East Valley Boulevard. As such, the project would redevelop the site and allow higher intensification of uses on-site. The project would be consistent with Policy 1.1 in this regard.
1.5 Promote and provide incentives for the aggregation of individual small lots into larger development parcels that support a significant scale and economically viable development.	Consistent. The project would merge two parcels (APNs 5369-018-002 and 5369-018-020) into one parcel as part of the proposed development. The project would be consistent with Policy 1.5 in this regard.
1.6 Accommodate the development of retail, office, and housing that capitalize upon the presence of transit at the highest densities permitted in the planning area.	Consistent. Refer to response to Policy 1.1.
1.7 Establish a priority and incentives for the development of mixed-use structures that integrate housing with retail commercial and/or office uses.	Consistent. Refer to response to Policy 1.1.
1.8 Restrict the ground floor of buildings for retail and other uses that promote pedestrian activity.	Consistent. As shown on Exhibit 2-4c, *Floor Plan – Ground Floor*, the project would provide approximately 10,542 square feet of ground-level commercial use along East Valley Boulevard. Additionally, the project frontage along East Valley Boulevard would include a loggia/courtyard (Main Entrance Courtyard), as well as floor-to-ceiling exterior ground level windows and signage to highlight the entrance to the commercial space and promote pedestrian activity. The landscaped courtyards, including the Main Entrance Courtyard, would include trees, planters with drought-tolerant grasses, trees, shrubs and groundcover, bicycle racks, granite pavers, and colored accent tiles. Decorative lighting fixtures and raised concrete planters would be installed throughout the mixed-use development. As such, the ground floor of the proposed mixed-use development would provide commercial uses and promote pedestrian activity. The project would be consistent with Policy 1.8 in this regard.
1.9 Support the inclusion of uses that enliven the outdoor and pedestrian environment such as restaurants, newsstands, small retail vendors, and comparable uses.	Consistent. Refer to response to Land Use Goal 1.5 in Table 4.11-2, and response to Policy 1.8 above. The ground-level commercial uses would include approximately 10,542square feet for general commercial/office use along East Valley Boulevard. The proposed mixed-use structure is street-facing and is surrounded by commercial development to the east,

Table 4.11-2 [cont'd]
Valley Boulevard Specific Plan Consistency Analysis

Relevant Policies	Consistency Analysis
	south, and west. Residential uses would occupy the second through fourth floors. As such, project implementation would support new development that efficiently and effectively combines residential and commercial uses. The project would be consistent with Policy 1.9 in this regard.
1.10 Accommodate development on a sliding scale of intensity, permitting the highest intensities for the development of mixed-use structures that integrate housing with retail or office uses and reducing intensities for single use structures.	Consistent. Refer to response to Policy 1.1. The project proposes to construct a mixed-use development with commercial and residential uses on a currently underutilized site developed with a surface parking lot. The infill development consists of 51 apartment units and approximately 10,542 square feet of ground-level commercial use. As such, project implementation would promote higher intensities for the development of mixed-use structures that integrate housing with retail or office uses and reduce intensities for single use structures. The project would be consistent with Policy 1.10 in this regard.
1.11 Design and develop properties and buildings to support intensive public activity; with buildings located along and oriented to the street frontages and common plazas and with visually transparent and architecturally articulated facades.	Consistent. Refer to response to Policy 1.8.
1.12 Locate and design development to relate to one or more transit stops, incorporating linkages and amenities for transit users.	Consistent. The project is located approximately 300 feet east of an existing Metro bus stop (Route 76) on East Valley Boulevard. Additionally, a bicycle storage room is proposed within the proposed residential lobby/ leasing office area. Two short-term bicycle racks would also be provided near the commercial uses along East Valley Boulevard and parking entrance along South Palm Avenue. As such, the project would provide multimodal amenities to encourage bicycle and transit use in the project area, and would be consistent with Policy 1.12 in this regard.
1.13 Promote the siting, orientation, and design of structures to minimize water and energy consumption and minimize liquid and solid waste.	Consistent. In order to minimize on-site water consumption, the project would install drought-tolerant landscaping and utilize water-efficient irrigation systems to maintain on-site landscaping. As detailed in Section 4.6, *Energy*, the proposed mixed-use development would include electric vehicle (EV) parking/charging spaces. The project would also provide a bicycle storage room and short-term bicycle racks. Energy-efficient appliances and electric landscape equipment would be installed throughout the development. Additionally, the project would include a solar-ready roof that would generate approximately 315,300-kilowatt hour per year. As discussed in Section 4.19, *Utilities and Service Systems*, the project would be required to comply with all Federal, State, and local statutes and regulations related to solid waste. Specifically, pursuant to *San Gabriel Municipal Code* (Municipal Code) Chapter 54, *Diversion of Construction and Demolition Waste*, at least 50 percent of construction and demolition waste generated shall be diverted from landfilling

Table 4.11-2 [cont'd]
Valley Boulevard Specific Plan Consistency Analysis

Relevant Policies	Consistency Analysis
	by using recycling, reuse, or other diversion programs. Overall, the project would be designed to minimize water and energy consumption as well as liquid and solid waste. The project would be consistent with Policy 1.13 in this regard.
1.14 Require that sites and buildings be designed to account for the ethnic and cultural values of San Gabriel's history and local residents.	Consistent. As detailed in Section 2.6, *Permits and Approvals*, the project would require City discretionary approvals for a Precise Plan of Design and Master Sign Plan. Pursuant to Municipal Code Section 153.355, *Evaluation Criteria*, upon consideration of the project's Precise Plan of Design application, the City of San Gabriel Planning Director, Design Review Commission, or City Council would ensure that the project site plan, architecture, and landscape design are architecturally harmonious, consistent with the scale and impact of similarly sited properties in the same neighborhood and zoning classification, and carry out the intent of the City's design guidelines. Additionally, the Applicant conducted a community meeting in April 2021 with members of the public and also met with the City's Design Review Committee in June 2021 to present the proposed project. Feedback from the meetings were integrated into the proposed development. Thus, the project would be designed to account for the values of San Gabriel's history and local residents upon community and the City's input. The project would be consistent with Policy 1.14 in this regard.
1.26 Promote and provide incentives for the re-use and intensification of development of the parcels northeast of the intersection of Valley Boulevard and Del Mar Avenue to take advantage of its proximity to proposed intensified development within the transit node and establish a pedestrian character to fit with the other uses within the node.	Consistent. Refer to response to Policies 1.1 and 1.4.

Source: City of San Gabriel, *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan*, Chapter 3 – Sustainable Land Use, adopted December 19, 2006, amended January 15, 2013.

ZONING CODE CONSISTENCY

According to the *City of San Gabriel Zoning Map* (Zoning Map) and the Specific Plan, the project site is zoned MU-T. The MU-T zone is intended to allow for a wide variety of uses, including retail, office, residential, public and service, hotel, and live/work units that support the principals for sustainable development (i.e., transit-oriented development) along East Valley Boulevard; refer to the Specific Plan Table 3-1, *Mixed-Use Transit (MU-T)*. As stated, the project proposes to construct a mixed-use development with residential and commercial uses. Therefore, the proposed uses would be consistent with the intent of the MU-T zone. Table 4.11-3, *Mixed-Use Transit Oriented (MU-T) Zone Development Standards Consistency Analysis*, details the project's consistency with applicable development standards outlined in the Specific Plan.

Table 4.11-3
Mixed-Use Transit Oriented (MU-T) Zone Development Standards Consistency Analysis

Development Standard	MU-T Zone Requirement	Proposed Project	Project Consistent?
Floor Area Ratio (FAR)	Minimum Parcel Size for Mixed-Use – 22,000 square feet FAR 3.0, with a maximum FAR 0.7 for non- residential uses	The project site is approximately 30,267 square feet. The proposed building area is approximately 79,129 square feet and the non-residential (commercial) portion of the site is approximately 10,542 square feet. Thus, the FAR for the project is approximately 2.61 and the FAR for the non-residential (commercial) portion is approximately 0.35, both of which are within the maximum allowable FAR.	Yes
Maximum Building Height	Five stories (67 feet) if 50,000+ square feet of retail use Four stories if <50,000 square feet of retail use Three stories if adjoining single-family residential	The project proposes less than 50,000 square feet of commercial/retail use and would construct a four story building, approximately 59 feet in height.	Yes
Maximum Story Height (Floor to Floor)	Retail: 18 feet Residential: 11 feet	The proposed ground level commercial use would have a story height of approximately 18 feet while the second, third, and fourth floors of residential units would have story heights of approximately 11 feet.	Yes
Property Set Back – Front	0 feet maximum, except for areas used for public outdoor dining/arcade, where the maximum setback shall be 10 feet	As shown on Exhibit 2-4c, frontage setback along East Valley Boulevard would range from approximately 12 to 18 feet and would include a loggia/courtyard (i.e., the Main Entrance Courtyard).	Yes
Property Set Back – Side	0 feet maximum, except for areas used by adjoining businesses for shared driveway access of a maximum 15 feet width	As shown on Exhibit 2-3, *Conceptual Site Plan*, the project's side yard setback on the eastern project boundary (abutting the single-story commercial structure to the southeast) is approximately 6 feet. Side yard setbacks on the western boundary (abutting the Salvation Army San Gabriel Center of Worship and Service) range from approximately five to seven feet.	Yes
Property Set Back – Rear	Adjoining residential properties: 15 feet minimum Adjoining commercial or office: 5 feet minimum	As shown on Exhibit 2-3, the project's rear yard setback to the north (abutting adjoining residential properties) is approximately 15 feet.	Yes
Second (Podium)-Level Setbacks - Front	0 to 10 feet; the setback can be used for balcony or terrace space	As shown on Exhibit 2-4d, *Floor Plan – Second Floor*, the front setback for the second floor is approximately five feet and nine inches.	Yes

Table 4.11-3 [cont'd]
Mixed-Use Transit Oriented (MU-T) Zone Development Standards Consistency Analysis

Development Standard	MU-T Zone Requirement	Proposed Project	Project Consistent?
Second (Podium)-Level Setbacks – Side and Rear	0 to 5 feet; the setback can be used for balcony or terrace space No additional setback is allowed on third or higher levels	As shown on Exhibit 2-4d, the side yard setback to the east and west for the second floor of the proposed building ranges from approximately three to five feet. No setbacks are proposed on the third and fourth floors of the building.	Yes
Lot Coverage	Site <300 feet in depth: 80-90% required Site >300 feet in depth: 70 to 80% required	The site is less than 300 feet in depth and the proposed building covers approximately 81 percent of the lot.	Yes
Parking – General Commercial and Office/ Restaurants	General Commercial and Office: 1 space per 375 square feet of gross floor area (valet parking permitted) Restaurant – Fast Food/Take Out: 1 space per 300 square feet of gross floor area (valet parking permitted)	The 8,742-square foot commercial/retail space would be required to provide 24 spaces, and the 1,800-square foot coffee shop that may be accommodated by the project would be required to provide 6 spaces. In total, the 10,542-square foot commercial space would be required to provide 30 spaces. The project would provide 42 public parking spaces (12 more spaces than required) for patrons and employees of the commercial uses.	Yes
Parking – Residential	1 space per unit for 0-1 bedrooms 2 spaces per unit for 2+ bedrooms (tandem parking allowed for residential uses) 1 guest space per 5 units	The project proposes 18 one-bedroom units and 33 two-bedroom units. Thus, the project would be required to provide 84 private residential parking spaces as well as 11 guest spaces. Overall, the project would provide 86 private residential spaces. The 11 required guest parking spaces would be accommodated by the 12 additional public parking spaces provided; refer to 'Parking – General Commercial and Office/Restaurants.'	Yes

Source: City of San Gabriel, *Valley Vision: Valley Boulevard Neighborhoods Sustainability Plan*, Chapter 3 – Sustainable Land Use, adopted December 19, 2006, amended January 15, 2013.

As shown in Table 4.11-3, the project would be consistent with all applicable MU-T zone development standards. As such, impacts in this regard would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

4.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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. According to the State Division of Mines and Geology, no areas within the project vicinity are mapped containing significant aggregate resources.[1,2] In addition, according to the General Plan Environmental Evaluation, no active mining operations exist within the City. No impacts would occur in this regard.

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).

Mitigation Measures: No mitigation measures are required.

1 California Department of Conservation, *Updated Designation of Regionally Significant Aggregate Resources in the San Gabriel Valley Production-Consumption Region, Los Angeles County*, April 2014.
2 California Department of Conservation, *Special Report 143 Part IV, Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region, Plate 4.11, El Monte Quadrangle*, 1982.

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4.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact 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 groundborne vibration or groundborne noise levels?		✓		
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

DESCRIPTION OF NOISE METRICS

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and 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 three 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 (is reduced) at a rate between three 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 three 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 a rate between 6 dBA and about 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. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

REGULATORY FRAMEWORK

State

The State Office of Planning and Research 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 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 CNEL.

Local

Comprehensive General Plan of the City of San Gabriel, California

The General Plan Noise Element identifies noise-sensitive land uses and noise sources, defines areas of noise impact, and establishes goals, policies, and programs to ensure that City residents are protected from excessive noise. The following General Plan noise goals are applicable to the proposed project:

Goal 9.2: Minimize the impact of traffic noise for those who live and work on our major roadways.

Goal 9.4: Protect residents from the harmful effects of noise from mechanical equipment and trucks.

Goal 9.6: Promote the health of our community by protecting it from the harmful effects of noise.

Table 4.13-1, *Exterior Noise Standards*, provides exterior noise standards for designated land uses within the City, and Table 4.13-2, *Interior Noise Standards*, provides the City's interior noise standards.

Table 4.13-1
Exterior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)	Standard 1 (dB)[1]	Standard 2 (dB)[2]	Standard 3 (dB)[3]	Standard 4 (dB)[4]	Standard 5 (dB)[5]
I	Noise-sensitive Area	Anytime	45	45	50	55	60	65
II	Residential Properties	10:00 p.m. – 7:00 a.m. (Nighttime)	45	45	50	55	60	65
		7:00 a.m. – 10:00 p.m. (Daytime)	50	50	55	60	65	70
III	Commercial Properties	10:00 p.m. – 7:00 a.m. (Nighttime)	55	55	60	65	70	75
		7:00 a.m. – 10:00 p.m. (Daytime)	60	60	65	70	75	80
IV	Industrial Properties	Anytime	70	70	75	80	85	90

Table 4.13-1 [cont'd]
Exterior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)	Standard 1 (dB)[1]	Standard 2 (dB)[2]	Standard 3 (dB)[3]	Standard 4 (dB)[4]	Standard 5 (dB)[5]
Notes: dB = decibels 1. Standard 1 is the exterior noise level that may not be exceeded for more than a total of 30 minutes in any hour. 2. Standard 2 is the exterior noise level that may not be exceeded for more than a total of 15 minutes in any hour. 3. Standard 3 is the exterior noise level that may not be exceeded for more than a total of 5 minutes in any hour. 4. Standard 4 is the exterior noise level that may not be exceeded for more than a total of 1 minute in any hour. 5. Standard 5 is the exterior noise level that may not be exceeded for any period of time.								
Source: City of San Gabriel, *Comprehensive General Plan of the City of San Gabriel*, May 18, 2004.								

Table 4.13-2
Interior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Allowable Interior Noise level (dB)	Standard 1 (dB)[1]	Standard 2 (dB)[2]	Standard 3 (dB)[3]
All	Residential	10:00 p.m. – 7:00 a.m.	40	45	50	55
		7:00 a.m. – 10:00 p.m.	45	45	50	55
Notes: dB = decibels 1. Standard No. 1 is the interior noise level that may not be exceeded for more than a total of 5 minutes in any hour. 2. Standard No. 2 is the interior noise level that may not be exceeded for more than a total of 1 minute in any hour. 3. Standard No. 3 is the interior noise level that may not be exceeded for any period of time.						
Source: City of San Gabriel, *Comprehensive General Plan of the City of San Gabriel*, May 18, 2004.						

San Gabriel Municipal Code

Although the City's noise standards are contained within the General Plan, the *San Gabriel Municipal Code* (Municipal Code) includes several references to noise control. The following sections of the Municipal Code are applicable to the proposed project:

Section 98.02 MAINTENANCE OF PREMISES; NUISANCES.

It shall be unlawful and hereby declared a public nuisance for any person or persons either owning, leasing, occupying or having charge or possession of any real property within the city to cause, permit or allow any of the following conditions to exist thereon:

(T) To maintain or operate, between the hours of 10:00 p.m. and 7:00 a.m., any device, instrument, vehicle or machinery in such a manner as to create noise or cause vibrations which cause discomfort or annoyance to reasonable persons of normal sensitivity, or which endangers the comfort, repose, health or peace of the public or of any person using or occupying other property in the vicinity;

Title XIII: General Offenses

Section 130.09 NOISE CAUSED BY MACHINERY.

It shall be unlawful for any person to run or operate, or permit to be run or operated, any mechanical, electrical, electronic, hydraulic, or wind-driven equipment, fan, pump, compressor, blower, motor, engine, machine, or other

similar apparatus, whether as owner, agent, employee, lessee, or other person having the charge thereof, which causes, or is likely to cause, any loud, excessive, unnecessary, or unusual continued or intermittent noise, or any noise which annoys, disturbs, injures, or endangers the comfort, repose, health, peace, or safety of others within the city unless such noise is muffled effectually and the apparatus is either equipped with a muffler device in constant operation and properly maintained to deaden such noise, or the apparatus is enclosed in a room, building, or other enclosure sufficiently insulated to deaden such noise.

Title XV: Land Usage

Section 150.003 Construction; Hours of Construction

No construction shall take place within the city except between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday and between the hours of 8:00 a.m. and 4:00 p.m. on Saturday. Construction shall be prohibited on Sundays and such holidays as may be designated by Council resolution. The Community Development Director may extend the hours of operation for special circumstances by providing written notice to surrounding residents in advance. The restriction on construction hours shall not apply to emergency repairs required to protect the public health, safety, ad welfare, whether performed by a public agency, utility, company, or private owner. Said restrictions also shall not apply to a residential property owner and or members of his immediate family, performing work on his personal property.

EXISTING CONDITIONS

Noise-Sensitive Receptors

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

Stationary Sources

The project area is located in a highly urbanized area. The primary sources of stationary noise in the project vicinity are urban-related activities, including parking areas, people talking, truck deliveries, dogs barking, etc. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Mobile Sources

According to the General Plan, transportation-related noise is the primary noise source in the City. The majority of existing noise in the project area is generated from vehicles traveling along East Valley Boulevard, Del Mar Avenue, and South Palm Avenue. In addition, commercial uses to the east and west contribute to infrequent mobile noise sources in the site vicinity.

Existing Ambient Noise Levels

In order to quantify existing ambient noise levels in the vicinity of the project site, two noise measurements were taken on August 12, 2021; refer to Table 4.13-3, *Noise Measurements*. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. Ten-minute measurements were

taken between 12:00 p.m. and 1:00 p.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day.

Table 4.13-3
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	In front of The Palms apartment complex at 1533 South Palm Avenue	57.4	45.3	72.4	92.3	12:00 p.m.
2	In front of the residence at 1516 South Del Mar Avenue	65.0	46.2	83.0	104.4	12:29 p.m.

Notes: dBA = A-weighted decibels, L_{eq} = Equivalent Sound Level; L_{min} = Minimum Sound Level; L_{max} = Maximum Sound Level, Peak = Highest Instantaneous Sound Level

Source: Michael Baker International, August 12, 2021.

Meteorological conditions included clear skies, warm temperatures, with light wind speeds (0 to 5 miles per hour), and low humidity. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for sound level meters. The results of the field measurements are included in Appendix F, *Noise Data*.

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 With Mitigation Incorporated.

CONSTRUCTION

Construction of the proposed project would occur over approximately 24 months and would include demolition, grading, building construction, and architectural coating phases. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table 4.13-4, *Maximum Noise Levels Generated by Typical Construction Equipment*. It should be noted that the noise levels identified in Table 4.13-4 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as placing down large pieces of equipment or the hydraulic movement of machinery lifts).

Table 4.13-4
Maximum Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 15 Feet (dBA)	Reference L_{max} at 50 Feet (dBA)
Concrete Saw	20	100	90
Crane	16	91	81
Concrete Mixer Truck	40	89	79
Backhoe	40	88	78
Dozer	40	92	82
Excavator	40	91	81
Forklift	40	88	78
Paver	50	87	77
Roller	20	90	80
Tractor	40	94	84
Water Truck	40	90	80
Grader	40	95	85
General Industrial Equipment	50	95	85

Note: L_{max} = maximum noise levels; dBA = A-weighted decibel
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the site. The potential for construction-related noise to affect nearby sensitive receptors would depend on the location and proximity of construction activities to these receptors. The closest sensitive receptors are the residences located adjacent to the northern project boundary. Specifically, construction activities could occur as close as 15 feet from the residential structure to the north of the project site. As shown in Table 4.13-4, these sensitive uses may be exposed to elevated noise levels during project construction. It should be noted that the noise levels identified in Table 4.13-4 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. The Municipal Code does not establish quantitative construction noise standards. Instead, the Municipal Code has established allowable hours of construction (7:00 a.m. to 7:00 p.m. on weekdays, 8:00 a.m. to 4:00 p.m. on Saturdays, and at no time on Sundays or legal holidays), of which the proposed project would adhere. Thus, construction activities would be conducted during allowable daytime hours, per the Municipal Code. These permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption. In order to ensure that noise generated during construction of the project would be lessened to the furthest extent possible, the project would be required to implement Mitigation Measure NOI-1. Mitigation Measure NOI-1 would incorporate best management practices during construction and ensure nuisances do not occur. Implementation of Mitigation Measure NOI-1 would further minimize impacts from construction noise as it requires construction equipment to be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices. Thus, impacts would be less than significant with implementation of Mitigation Measure NOI-1.

OPERATIONS

Mobile Noise

According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear.[1] Based on the *Proposed 205 E. Valley Boulevard Residential Mixed-Use Project Traffic Letter* (Trip Generation/VMT Memo), prepared by KOA Corporation (dated August 18, 2021), the proposed project would generate 485 daily trips; refer to Appendix G, *Trip Generation/VMT Memo*. As shown in Table 4.13-5, *Existing and Project Traffic Volumes*, the project's trip generation (approximately 485 daily trips) would not double existing traffic volumes along Valley Boulevard, Del Mar Avenue, Palm Avenue, Euclid Avenue, Walnut Street, or San Gabriel Boulevard. Therefore, the project would not cause a perceptible increase in traffic noise along local roadways and impacts would be less than significant.

Table 4.13-5
Existing and Project Traffic Volumes

Segment	Existing Daily Trips[1]	Project Daily Trips	Doubling of Traffic Volumes?
Valley Boulevard			
West of Del Mar Avenue	16,851	485	No
East of Del Mar Avenue	15,883	485	No
West of Palm Avenue	16,326	485	No
East of Palm Avenue	16,140	485	No
West of Euclid Avenue	16,223	485	No
East of Euclid Avenue	15,996	485	No
West of Walnut Street	28,655	485	No
East of Walnut Street	29,767	485	No
West of San Gabriel Boulevard	30,869	485	No
East of San Gabriel Boulevard	31,806	485	No
Del Mar Avenue			
North of Valley Boulevard	15,677	485	No
South of Valley Boulevard	18,355	485	No
Palm Avenue			
North of Valley Boulevard	721	485	No
Euclid Avenue			
North of Valley Boulevard	597	485	No
South of Valley Boulevard	288	485	No
Walnut Street			
North of Valley Boulevard	3,265	485	No
South of Valley Boulevard	3,224	485	No
San Gabriel Boulevard			
North of Valley Boulevard	42,302	485	No
South of Valley Boulevard	43,610	485	No

Notes:
1. Existing Daily Trips are expressed as Average Daily Trips (ADT) along each segment.

Sources:
City of San Gabriel, *Existing Peak Hour Intersection Turning Movements Counts and Roadway Link ADT's*, 2018 and updated 2021.
KOA Corporation, *Proposed 205 E. Valley Boulevard Residential Mixed-Use Project Traffic Letter*, August 18, 2021.

[1] U.S. Department of Transportation, *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, updated August 24, 2017, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed September 8, 2021.

Stationary Noise Impacts

Stationary noise sources associated with the proposed project would include mechanical equipment, slow-moving trucks, parking activities, and outdoor courtyard/balcony area activities. These noise sources are typically intermittent and short in duration and would be comparable to existing sources of noise experienced in the site vicinity. All stationary noise activities would be required to comply with the exterior and interior noise standards established in the Municipal Code, as well as the California Building Code requirements pertaining to noise attenuation.

Mechanical Equipment

The project would include heating, ventilation, and air conditioning (HVAC) units located on the roof of the proposed four-story (59 feet in height) mixed-use building. HVAC systems can result in noise levels of approximately 55 dBA L_{eq} at 2.9 feet from the source.[2] The nearest sensitive receptor is located adjacent to the north of the project site. HVAC units would be located as close as 30 feet south of the nearest sensitive receptor. This would place the HVAC units approximately 59 feet up and 30 feet to the south of the nearest sensitive receptor. By using the Pythagorean theorem, this calculates that the HVAC unit could be located as close as 66 feet from the nearest sensitive receptor.[3] Therefore, noise levels from the HVAC units could reach approximately 28 dBA at the nearest sensitive receptor without an enclosure or noise attenuation features. However, the HVAC units would be shielded by a mechanical screen wall in compliance with Municipal Code Section 130.09, *Noise Caused by Machinery*, and a parapet wall which would further attenuate operational noise from the HVAC units. As such, the City's exterior daytime (50 dB) and nighttime (45 dB) noise standards would not be exceeded as a result of HVAC units at the project site and a less than significant impact would occur in this regard.

Slow-Moving Trucks

The project proposes a mixed-use development with residential and commercial uses that would necessitate occasional garbage and delivery truck operations. Typically, a medium two-axle truck used to make deliveries can generate a maximum noise level of 75 dBA at a distance of 50 feet.[4] These are levels generated by a truck that is operated by an experienced "reasonable" driver with typically applied accelerations. Higher noise levels may be generated by the excessive application of power. Lower levels may be achieved, but would not be considered representative of a normal truck operation. Slow-moving truck operations (i.e., garbage and delivery trucks) would occur within the enclosed parking structure and may occur outside of normal business operating hours. However, noise generated from slow-moving truck operations within the enclosed parking structure would be imperceptible at the nearest sensitive receptor. Therefore, the City's exterior daytime (50 dB) and nighttime (45 dB) noise standards would not be exceeded as a result of garbage and delivery truck operations. Furthermore, garbage and delivery trucks currently service the surrounding uses, and thus would not introduce a new source of noise to the site vicinity. As such, impacts would be less than significant in this regard.

Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-

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2 Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.

3 The Pythagorean theorem allows individuals to calculate the actual distance between a suspended object and a starting point. In this case, the starting point would be the closest sensitive receptor located approximately 30 feet to the north (side a) of the HVAC unit and the suspended object is the HVAC unit, located 59 feet up (side b). By plugging these values into the equation, we can calculate the hypotenuse (side c), or the distance between the HVAC unit and the sensitive receptor.

4 Measurements taken by Michael Baker International, 2006.

sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table 4.13-6, *Typical Noise Levels Generated by Parking Lots*. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 48 feet for normal speech to 50 dBA at 50 feet for very loud speech.

Table 4.13-6
Typical Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}

Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

The project would provide 128 parking spaces within the proposed parking garage. As shown in Table 4.13-6, parking lot noise levels could range between 53 dBA and 61 dBA at 50 feet. Since the parking noise levels would be instantaneous compared to the land use compatibility noise standards in the CNEL scale, which are averaged over time, actual noise levels over time resulting from parking lot activities would be far lower. In addition, impacts associated with the parking garage would be considered minimal since the parking area would be enclosed within a structure. Further, parking lot noise currently occurs in the project vicinity under existing conditions. Therefore, the proposed parking garage would not result in substantially greater noise levels than currently exist at the project site. Noise associated with parking activities is not anticipated to exceed the City's noise standards during operation. Therefore, noise impacts from parking lots would be less than significant.

Courtyard/Balcony Noise

The proposed project includes outdoor courtyards and balconies which have the potential to be accessed by groups of people intermittently for outdoor events, parties, lunch, dinner, etc. Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated at 60 dBA at one meter (3.28 feet) away for raised normal speaking.[5] This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members.[6] Therefore, crowd noise would be approximately 62 dBA at one meter from the source (i.e., the outdoor courtyards and/or balconies).

Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source.[7] The nearest sensitive receptor would be the residences to the north of the project site, located approximately 19 feet from the outdoor courtyard (i.e., Northside Courtyard) and 30 feet from balconies on the northern side of the building. Therefore, crowd noise at the nearest sensitive receptor would be 47 dBA (outdoor courtyard) and 43 dBA (balconies). It should be noted that an existing masonry wall would separate the proposed project site and the nearest sensitive receptors, which would result in a noise level reduction of at least 10 dBA.[8] Therefore, outdoor courtyard crowd noise at the nearest sensitive receptor would be approximately 37 dBA. As such, crowd noise generated at the project site would

5 M.J. Hayne, et al, *Prediction of Crowd Noise*, Acoustics, November 2006.
6 *Ibid*.
7 Cyril M. Harris, *Noise Control in Buildings*, 1994.
8 National Cooperative Highway Research Program (NCHRP), *Synthesis of Highway Practice 87, Highway Noise Barriers*, December 1981, http://onlinepubs.trb.org/Onlinepubs/nchrp/nchrp_syn_87.pdf, accessed September 8, 2021.

not exceed the City's exterior daytime (50 dB) and nighttime (45 dB) noise standards. A less than significant impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

NOI-1 The project Applicant and/or Contractor shall implement the following noise-attenuating measures during construction of the proposed project:

- Construction contracts shall specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.

- A sign, legible at a distance of 50 feet from the property line shall be posted at the project construction site. All notices and signs shall be reviewed and approved by the City of San Gabriel Community Development Department prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where the public can inquire about the construction process and register complaints.

- The project Applicant shall provide, to the satisfaction of the City of San Gabriel Community Development Department, a qualified "Noise Disturbance Coordinator." The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City of San Gabriel Community Development Department. All signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.

- Prior to issuance of any grading or building permit, the project Applicant shall demonstrate to the satisfaction of the City's Building Official that construction noise reduction methods shall be used where feasible. These reduction methods include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and utilizing electric air compressors and similar power tools.

- Construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, convalescent homes, etc.), to the extent feasible.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- Per the San Gabriel Municipal Code, construction shall be limited to the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and from 8:00 a.m. to 4:00 p.m. on Saturday. No construction shall occur on Sundays or legal holidays.

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

Less Than Significant Impact With Mitigation.

CONSTRUCTION

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of 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. Groundborne vibrations from construction activities rarely reach levels that damage structures. The vibration produced by construction equipment is illustrated in Table 4.13-7, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-7
Typical Vibration Levels for Construction Equipment

Equipment	Reference Approximate peak particle velocity at 25 feet (inches/second)[1]	Approximate peak particle velocity at 6 feet (inches/second)[1]	Approximate peak particle velocity at 15 feet (inches/second)[1]
Pile Driver *(Impact – Upper Range)*	1.518	12.911	3.266
Pile Driver *(Sonic – Upper Range)*	0.734	6.243	1.579
Vibratory Roller	0.210	1.786	0.452
Large bulldozer	0.089	0.757	0.191
Caisson Drilling	0.089	0.757	0.191
Loaded trucks	0.076	0.646	0.164

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. For most residential and commercial structures that are engineered concrete and masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.3 inches per second (in/sec). Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment.

Groundborne vibration decreases rapidly with distance. As construction is proposed up to the project property lines, the nearest structures are located approximately six feet east and 15 feet north of the of the proposed construction area. As indicated in Table 4.13-7, vibration velocities from typical heavy construction equipment used during project

construction would range from 0.646 to 12.911 in/sec PPV at six feet from the source of activity and from 0.164 to 3.266 in/sec PPV at 15 feet from the source of activity, which would exceed the FTA's 0.3 in/sec PPV threshold. Therefore, Mitigation Measure NOI-2 would be required to reduce vibration velocities to below the FTA's 0.3 in/sec PPV threshold. Mitigation Measure NOI-2 is directly related to vibration control and requires a qualified professional to prepare construction vibration control plans to utilize pneumatic impact equipment. As shown in Table 4.13-8, *Construction Buffer Zone Vibration Levels*, heavy-duty construction equipment operating outside of the construction buffer zone would not exceed the FTA's 0.3 in/sec PPV threshold. Therefore, groundborne vibration impacts would be less than significant with implementation of Mitigation Measure NOI-2.

Table 4.13-8
Construction Buffer Zone Vibration Levels

Equipment	Nearest Distance of Heavy-Duty Construction Equipment Activity to Northern and Eastern Structures (feet)	Peak Particle Velocity (in/sec)[1]
Pile Driver *(Impact – Upper Range)*	75	0.292
Pile Driver *(Sonic – Upper Range)*	46	0.294
Vibratory Roller	20	0.293
Large Bulldozer	12	0.268
Caisson Drilling	12	0.268
Loaded Trucks	11	0.260

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 12-2 of the FTA *Transit Noise and Vibration Impact Assessment Manual*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

OPERATIONS

Operations of the proposed mixed-use development would not generate groundborne vibration that could be felt at surrounding uses. The proposed project would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. No impact would occur in this regard.

***Mitigation Measures*:**

NOI-2 The project Applicant shall incorporate the following measures on all grading and building plans and specifications subject to approval of the City of San Gabriel Building and Safety Division prior to issuance of a demolition or grading permit (whichever occurs first):

- Construction equipment shall not approach the construction buffer zone adjacent to existing structures adjoining the project site to the north and east. The buffer zone shall be tiered based on distances established in the table below.

Equipment	Nearest Distance of Heavy-Duty Construction Equipment Activity to Northern and Eastern Structures (Feet)	Peak Particle Velocity (in/sec)
Pile Driver *(Impact – Upper Range)*	75	0.292
Pile Driver *(Sonic – Upper Range)*	46	0.294
Vibratory Roller	20	0.293
Large Bulldozer	12	0.268
Caisson Drilling	12	0.268
Loaded Trucks	11	0.260

As shown in the table above, impact pile drivers shall not operate within 75 feet, sonic pile drivers shall not operate within 46 feet, vibratory rollers shall not operate within 20 feet, large bulldozers and caisson drilling shall not operate with 12 feet, and loaded trucks shall not operate within 11 feet of the structures adjoining the project site to the north and east. The buffer zone shall be in enforced between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 8:00 a.m. and 4:00 p.m. on Saturday, pursuant to San Gabriel Municipal Code Section 150.003, *Construction; Hours of Construction*.

- The Applicant shall utilize a construction vibration monitoring system with the potential to measure low levels of vibration to ensure vibration levels do not exceed the FTA's 0.3 inch-per-second PPV threshold.

- The Applicant shall conduct sensitivity training to inform construction personnel about the existing sensitive receptors surrounding the project and about methods to reduce noise and vibration.

- Alternatively, if the above measures are deemed infeasible by the City of San Gabriel Building and Safety Division, the Applicant shall require by contract specifications that a certified structural engineer and/or geologist be retained to submit evidence that the operation of vibration-generating equipment associated with the project would not result vibration levels exceeding the FTA's 0.3 inch-per-second PPV threshold. Contract specifications shall be included in the project construction documents, which shall be reviewed by the City prior to issuance of a demolition or grading permit (whichever occurs first). The documents shall include provisions for vibration monitoring during the operation of heavy-duty construction equipment, as well as include provisions to ensure vibration levels do not exceed 0.3 inch-per-second PPV at the structures adjoining the project site to the north and east.

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

***No Impact*.** The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue in the City of El Monte, approximately 3.4 miles to the east. Therefore, project implementation would not expose people residing or working in the project area to excessive airport noise levels. No impact would occur.

***Mitigation Measures*:** No mitigation measures are required.

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4.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 proposed building would consist of 51 apartment units and approximately 10,542 square feet of ground-level commercial use. Thus, the project would directly induce population growth in the City.

Although an uncertainty exists regarding the number of new employees and residents who may choose to relocate to the City as a result of the project, a conservative analysis of impacts associated with direct population growth can be provided. Based on the City's average household size of 3.13, the 51 apartment units would result in a population increase of approximately 160 residents.[1] Additionally, based on an employment generation rate of one employee per 424 square feet of commercial use (i.e., the 1,800-square foot coffee shop) and one employee per 319 square feet of low-rise office/general commercial use (i.e., the 8,742-square foot office/commercial space), the project would generate approximately 31 jobs.[2] Conservatively assuming that 100 percent of the project's future employees and residents relocate to San Gabriel, project implementation would result in a potential population increase of approximately 257 persons. The potential population growth generated by the project would increase the City's estimated 2021 population from 39,945 persons to 40,202 persons, an increase of approximately 0.6 percent. It should be noted that due to the nature of the proposed commercial uses (commercial/office use and coffee shop), it is not likely that future employees would relocate to the City from other jurisdictions. Instead, it is likely that the project's commercial space provides jobs for people already residing within San Gabriel.

Potential population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) growth forecasts estimate the City's population to reach 45,800 persons by 2045, representing a total increase of 5,100 persons between 2016 and 2045.[3] SCAG's regional growth projections are based upon long-range development assumptions (i.e., General Plans) of the relevant jurisdiction. The project's anticipated population growth (257 persons) would represent approximately 0.6 percent of the City's anticipated 2045 population, and

1 California Department of Finance Demographic Research Unit, *Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2021, with 2010 Benchmark*, May 1, 2021.
2 The Natelson Company, Inc, *Employment Density Study Report*, October 31, 2001.
3 Southern California Association of Governments, *2020-2045 RTP/SCS Final Growth Forecast by Jurisdiction*, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579, accessed September 27, 2021.

approximately 5.0 percent of the City's anticipated growth between 2016 and 2045. Thus, the project's estimated population growth would be within regional growth projections for the City.

Overall, although the project may result in direct population growth from future employees and residents relocating to the City, the proposed project would not induce substantial unplanned population growth exceeding existing local conditions or regional population projections. Specifically, buildout of the project site under the existing Commercial Specific Plan land use designation was already contemplated in the General Plan, Specific Plan, and SCAG regional growth forecasts. As a result, the project would result in less than significant impacts with regards to substantial unplanned population growth.

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 site is currently developed as an asphalt-paved surface parking lot. There are no existing residents or housing on-site. Thus, project implementation would not displace existing people or housing or necessitate the construction of replacement housing elsewhere. Further, the proposed project would provide additional housing within the City as an infill development on a currently underutilized site. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

4.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

a) Would the project 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:

1) Fire protection?

Less Than Significant Impact. The San Gabriel Fire Department (SGFD) provides fire protection and paramedic services for the City. Two SGFD fire stations serve the City of San Gabriel: Fire Station 51 at 1303 South Del Mar Avenue and Fire Station 52 at 115 North Del Mar Avenue. Fire Station 51 includes divisions of administration, emergency management services, fire prevention, and training, and is equipped with a battalion vehicle, paramedic engine, rescue ambulance, and an urban search and rescue. Fire Station 52 is housed with a paramedic engine.[1] The closest fire station to the project site is Fire Station 51, located approximately 0.4-mile to the northwest.

The proposed project would create an increased demand for fire protection services. However, as a mixed-use development with residential and commercial uses, the project would be consistent with the land uses anticipated for the site; refer to Section 4.11, *Land Use and Planning*. The project would not induce significant or unplanned population growth and would not result in the need for new or physically altered fire protection facilities; refer to Section 4.14, *Population and Housing*. Further, the proposed project would be required to comply with SGFD requirements for emergency access, fire flow, fire protection standards, fire lanes, and other site design/building standards. The proposed driveways and interior vehicular circulation are designed to meet the SGFD turning radius requirements. Existing fire hydrants are located near the proposed building perimeter with the closest located at the northeast intersection of South Palm Avenue and East Valley Boulevard. A fire water lateral would be installed to connect to existing water facilities in East Valley Boulevard. Additionally, the project is subject to design requirements set forth in the 2019 California Fire Code and the 2019 California Building Standards Code. Pursuant to General Plan Action 5.2.2.1, the City would only approve development with site design features, fire retardant building materials, and egress

[1] City of San Gabriel Website, *Fire Stations 51 and 52*, https://www.sangabrielcity.com/177/Stations, accessed August 19, 2021.

systems designed to reduce the risk of fire. The City would collect a one-time development impact fee in accordance with Municipal Code Section 154.004, *Fire Facility Impact Fees*, which is imposed on all new development to help pay fair share of costs in upgrading the City's fire facilities, as needed. Payment of these fees would offset the project's impacts to the acquisition, design, and construction of new fire facilities. Following collection of development impact fees and compliance with Municipal Code and SGFD requirements, the project's operational impacts to fire protection services would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) Police protection?

Less Than Significant Impact. The San Gabriel Police Department (SGPD) provides police protection services to the City of San Gabriel and operates approximately 1.1-mile northwest of the project site at 625 South Del Mar Avenue. The City is served by 53 sworn officers and 16 civilian employees.[2] Police services are funded through the City's General Fund, which includes funds collected from property and sales tax and development impact fees.

As discussed in Response 4.15 (a)(1) above, the proposed project is consistent with the site's land use and zoning and would not induce substantial unplanned population growth. Project construction and operation would be subject to compliance with Municipal Code Chapter 150, *Building Regulations*, which includes emergency access requirements that would minimize site safety hazards and potential construction-related impacts to police services. Ongoing property and sales taxes generated during project operations would contribute to the City's General Fund to offset impacts to police protection services. In addition, the City would collect a one-time development impact fee in accordance with Municipal Code Section 154.003, *Police Facility Impact Fees*, which would offset the project's fair share of costs to fund future acquisitions, design, construction, and financing of new police facilities. The project would also be subject to site plan review by the City prior to project approval to ensure that it meets City requirements in regard to safety (e.g., nighttime security lighting). As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

3) Schools?

Less Than Significant Impact. The project site is served by San Gabriel Unified School District (SGUSD), which operates five elementary schools, one middle school, and two high schools, providing educational services for students from kindergarten through 12th grade.[3] The closest SGUSD schools include McKinley Elementary School (located approximately 0.4-mile to the northwest at 1425 Manley Drive), Jefferson Middle School (located approximately 2.7-miles to the northeast at 1372 East Las Tunas Drive), and Gabrielino High School (located approximately 0.6-mile to the west at 1327 South San Gabriel Boulevard).

The project includes the development of 51 apartment units, which could generate additional students in the project area; refer to Section 4.14. However, the proposed project would not significantly increase the need for school facilities, as the project is consistent with the site's existing land use designation and zoning and would not result in substantial unplanned population growth. Furthermore, the project would be required to comply with Senate Bill (SB) 50 requirements, which allows school districts to collect impact fees from new development. According to Section 65997 of the California Government Code, payment of statutory fees is the exclusive method of mitigating environmental effects related to the adequacy of school facilities when considering the approval or the establishment of conditions for

[2] City of San Gabriel, *San Gabriel Police Department*, https://www.sangabrielcity.com/679/San-Gabriel-Police-Department, accessed August 19, 2021.

[3] California Department of Education, *2018-19 Enrollment by Ethnicity and Grade San Gabriel Unified District Report (19-75291)*, https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=1975291&agglevel=district&year=2018-19, accessed August 19, 2021.

the approval of a development project. Thus, upon payment of required SB 50 related fees by the project Applicant, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

4) Parks?

Less Than Significant Impact. The City of San Gabriel Community Services Department operates and maintains six parks within the City, for a total of 19 acres of parks and park facilities.[4] The nearest park to the project site is Marshall Park, located approximately 0.7-mile to the southwest at 311 West Marshall Street.

The project does not propose new or physically altered parks or recreational facilities. As discussed above, the proposed project is consistent with the site's existing land use designation and zoning and would not result in unplanned population growth. Additionally, the project proposes common open space on the ground level in the Main Entrance Courtyard and Northside Courtyard and on the fourth floor courtyard with accompanying landscaping. The fourth floor courtyard would be furnished with outdoor tables, chairs/sofas, and barbecue units. The project would also provide several residential amenities, including a lobby, community rooms on the second and third floors, and the previously described landscaped courtyard on the fourth floor. Further, private open space (e.g., patios and/or balconies) is provided for each residential unit.

Moreover, the City would collect a one-time open space and recreation development impact fee in accordance with Municipal Code Section 154.001, *Open Space and Recreation Impact Fees*, which would offset the project's fair share of costs to fund future acquisitions, design, construction, and financing of parks, recreation, and open space facilities, as needed. Payment of development impact fees would ensure the project's impacts related to parks and recreational services are reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

5) Other public facilities?

Less Than Significant Impact. The San Gabriel Library, located approximately 1.2-miles north of the project site at 500 South Del Mar Avenue, is part of the larger County of Los Angeles Public Library system. The 13,718-square foot library has a children's area, teen space, 16 public-use computers, and a meeting room.[5] As discussed above, the proposed project is consistent with the site's existing land use designation and zoning and would not result in substantial unplanned population growth. As such, the project would not increase demand for other public facilities, such as libraries, in a manner that would adversely impact existing facilities; refer to Responses 4.15(a)(1) through 4.15(a)(4). Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[4] GreenPlay, LLC, *Dream Your Park – San Gabriel Parks and Open Space Master Plan*, https://www.sangabrielcity.com/DocumentCenter/View/9201/San-Gabriel---Master-Plan-Draft-2818?bidId=, February 2018.

[5] County of Los Angeles Public Library, *San Gabriel Library*, http://www.colapublib.org/libs/sangabriel/, accessed August 20, 2021.

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4.16 RECREATION

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

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

Less Than Significant Impact. Refer to Response 4.15(a)(4).

***Mitigation Measures*:** No mitigation measures are required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation measures are required.

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4.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact 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 Section 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?		✓		

This section is primarily based on the *Proposed 205 East Valley Boulevard Residential Mixed-Use Project Traffic Letter* (Traffic Letter), prepared by KOA Corporation, dated August 18, 2021; refer to Appendix G, *Trip Generation/VMT Memo*. It is acknowledged that the Traffic Letter evaluates buildout of 51 multi-family units and 10,638 square feet of commercial use. Since the Traffic Letter was prepared in August 2021, the project has been revised and currently proposes 51 multi-family units and 10,542 square feet of commercial use; refer to Section 2.4, *Project Characteristics*. As such, the analysis provided in the Traffic Letter conservatively overestimates the slight difference in commercial square footage (96 additional square feet).

PROJECT TRIP GENERATION

In order to accurately assess traffic conditions with the proposed project, trip generation estimates were developed for the project. Trip generation rates for the project were based on nationally recognized recommendations contained within the Institution of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition. Traffic volumes expected to be generated by the proposed project were based upon rates per thousand square feet of gross floor area. The ITE Land Use Code (LUC) 221 (Multifamily Housing [Mid-Rise]) trip generation rate was used to forecast traffic volumes associated with the project's proposed residential component, and the ITE LUC 820 (Shopping Center) trip generation rate was used to forecast traffic volumes associated with the project's proposed commercial component.

The trip generation rates and estimated project-generated trips are presented in Table 4.17-1, *Project Trip Generation*. Trip adjustments were applied to the estimated project-generated trips to include internal capture and pass-by adjustments according to the ITE *Trip Generation Handbook*, 3rd Edition. For internal capture, given the mix of proposed uses (i.e., residential and commercial uses), it is expected that there would be trip interactions between individual uses that would not require the use of a vehicle. It is generally recognized that residents, visitors, employees, and patrons of a site will utilize other on-site uses if they are conveniently located and/or provide useful services or amenities, with the level of interaction dependent upon the number of residents, visitors, employees, and patrons; service providers; accessibility; and other factors. As such, it is assumed that future residents of the project may patronize the on-site commercial uses. Thus, a reduction in external trips is expected as some trips can be made internally between the project's residential and commercial components.

Trip adjustment factors for the project also account for the presence of "pass-by" trips. As motorists pass by the site, the specific convenient facilities provided by the project (or other factors) may produce a stop at the site. Such activity is considered to be an interim stop along a trip that existed irrespective of the development of the project, and therefore

vehicles making these stops are not considered to be newly generated project-related traffic. The ITE *Trip Generation Handbook*, 3rd Edition was used to estimate the pass-by trip reduction percentages for the project's proposed commercial use.

As summarized in Table 4.17-1, the proposed project is expected to generate a net increase of 485 average daily trips, including 28 vehicle trips during the weekday a.m. peak hour and 37 vehicle trips during the weekday p.m. peak hour.

Table 4.17-1
Project Trip Generation

Land Use	Buildout	Average Weekday	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Generation Rates								
Multifamily Housing (Mid-Rise) ITE Land Use Code 221		5.44	26%	74%	0.36	61%	39%	0.44
Shopping Center ITE Land Use Code 820		37.75	62%	38%	0.94	48%	52%	3.81
Trip Generation Summary								
Proposed Uses								
Multifamily Housing (Mid-Rise)	51 DU	277	5	13	18	13	9	22
Internal Capture Adjustment		(48)	0	0	0	(5)	(2)	(7)
Multifamily Housing (Mid-Rise) Total		*229*	*5*	*13*	*18*	*8*	*7*	*15*
Shopping Center	10,638 GSF	402	6	4	10	20	21	41
Internal Capture Adjustment		(55)	0	0	0	(2)	(5)	(7)
Pass-By Adjustment		(91)	0	0	0	(6)	(6)	(12)
Shopping Center Total		*256*	*6*	*4*	*10*	*12*	*10*	*22*
Project Driveway Trips (including Pass-By Trips)		*576*	*11*	*17*	*28*	*26*	*23*	*49*
NET TOTAL PROJECT TRIPS		**485**	**11**	**17**	**28**	**20**	**17**	**37**

Notes: DU = dwelling units; GSF = gross square feet

Source: KOA Corporation, *Proposed 205 East Valley Boulevard Residential Mixed-Use Project Traffic Letter*, August 18, 2021; refer to Appendix G.

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

Less Than Significant Impact.

ROADWAY FACILITIES

Refer to Response 4.17(b) regarding project impacts on roadway facilities.

TRANSIT, BICYCLE, AND PEDESTRIAN FACILITIES

The project site is located near existing transit and pedestrian facilities. Transit services in the project area are provided by Metro (Lines 76 and 487/489) with the closest bus stop approximately 300 feet west of the site on East Valley Boulevard. Pedestrian sidewalks are also provided along East Valley Boulevard and South Palm Avenue. However, no bicycle facilities are currently located near the project site.

Metro Line 76 provides east-west local bus service between downtown Los Angeles and El Monte primarily along Valley Boulevard. Bus stops are located east and west of the project site at the intersection of Walnut Street and Del

Mar Avenue, respectively. Line 76 operates on the weekdays with peak hour headways of approximately 20 minutes and weekends with headways of approximately 20 to 30 minutes.

Metro Line 487/489 provides east-west weekday express bus service between Downtown Los Angeles and the Sierra Madre Villa Station in Pasadena via Line 487 and Arcadia via Line 489. Line 487 operates weekday eastbound and westbound service with morning and afternoon headways of approximately 35 to 45 minutes; weekend service is provided with headways of approximately 45 minutes. Line 489 operates weekday only service with westbound service in the morning period with headways of approximately 40 minutes, and eastbound service in the afternoon period with headways of approximately 40 minutes.

Implementation of the proposed project would not impair existing pedestrian sidewalks or transit services along East Valley Boulevard. Rather, the infill mixed-use development would encourage the use of existing pedestrian and transit services in the project area. The project would also provide a bicycle storage room and short-term bicycle racks on-site to encourage additional multimodal transportation. As such, the project would not conflict with any program plan, ordinance, or policy addressing the circulation system. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact.

The VMT Analysis evaluates the project's vehicle miles traveled (VMT) impacts in accordance with the *City of San Gabriel Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (TS Guidelines), dated September 2020, to satisfy SB 473 requirements and CEQA Guidelines Section 15064.3, subdivision (b). As outlined in the TS Guidelines, a VMT screening analysis is required in order to determine whether or not a project will need to provide further VMT analysis. As part of the screening analysis, there are three screening steps that a project performs to determine if it will be required to conduct any further VMT analysis:

- Transit Priority Area (TPA) Screening – Projects located within a TPA may be presumed to have a less than significant impact;
- Low VMT Area Screening – Projects located within a low VMT-generating area may be presumed to have a less than significant impact; and
- Project Type Screening – Specific projects that have been identified that may include, but not be limited to, the following are presumed to have a less than significant impact:
  - Local-serving K-12 schools;
  - Local parks;
  - Local-serving retail uses less than 50,000 square feet, including:
    - Gas stations;
    - Banks;
    - Restaurants;
    - Shopping Center;
  - Affordable, supportive, or transitional housing; and
  - Senior housing (as defined by the U.S. Department of Housing and Urban Development).

In addition to the TS Guidelines, the San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool was utilized to determine whether the project would require a VMT analysis. The SGVCOG VMT Evaluation Tool screens

information based on the project information, project baseline year, and the land-use types to conduct a screening analysis.

TRANSIT PRIORITY AREA SCREENING

TPAs are defined as areas within 0.5-mile of an existing major transit stop/station or high-quality transit corridor with a frequency of service of 15 minutes or less during the peak commute hours. Based on this definition, the project site is not located within a TPA. As such, the project is not presumed to have a less than significant impact based on the TPA screening step.

LOW VMT AREA SCREENING

The Low VMT Area Screening step considers vehicle trips associated with the resident and worker trips to and from the project site. Based on the SGVCOG VMT Evaluation Tool results, for both the project's residential and commercial components, the home-based VMT per capita (for residential uses) and the home-based work VMT per worker (for the commercial uses) were determined to be located within a low VMT-generating area. As such, the project would not be required to conduct any further VMT analysis for either the residential or commercial components and would have a less than significant impact in this regard.

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)?

Less Than Significant Impact. The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment). Existing vehicular access to the site is provided via one driveway along East Valley Boulevard and one driveway along South Palm Avenue. The project proposed to remove both existing driveways and provide a new driveway along South Palm Avenue; refer to Exhibit 2-3, *Conceptual Site Plan*. The new two-way driveway would be perpendicular to South Palm Avenue and would be designed to meet all applicable driveway design standards and emergency access standards required by the City of San Gabriel Public Works Department and San Gabriel Fire Department. As such, the project would not increase hazards due to geometric design features or incompatible uses and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact With Mitigation Incorporated. According to the General Plan, the City's *Multi-Hazard Functional Plan* establishes tactics to address local and regional hazards. Since 1989, the City has operated an Emergency Operation Center (EOC) located at 1303 South Del Mar Avenue to function as the central command post in the event of a disaster.

As detailed above in Response 4.17(c), the site access would be provided via one two-way driveway along South Palm Avenue. The two existing Valley Boulevard and Palm Avenue driveways would be removed. The proposed driveway would be required to comply with City design standards and emergency access standards. Further, should partial or full lane closures be required during construction activities, implementation of a Traffic Management Plan (TMP) would minimize congestion and ensure safe travel, including emergency access in the project vicinity; refer to Mitigation Measure TRA-1. As a result, project implementation would not result in inadequate emergency access. Impacts would be less than significant in this regard.

Mitigation Measures:

TRA-1 Prior to issuance of grading permits, the project Applicant shall prepare a Traffic Management Plan (TMP) for approval by the City of San Gabriel Traffic Engineer. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use. The TMP shall specify that one direction of travel in each direction must always be maintained along East Valley Boulevard and South Palm Avenue throughout project construction duration. Pedestrian sidewalks and bus stops shall remain open and accessible, to the greatest extent feasible, during construction or shall be re-routed to ensure continued connectivity while maintaining Americans with Disabilities Act (ADA) accessibility. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

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4.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) 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				✓
2) 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 Assembly Bill 52 (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 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 traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines 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" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

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 Initial Study.

a) 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:

1) 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)?

No Impact. As detailed in Response 4.5(a), no historic resources listed or eligible for listing in a State or local register of historical resources are located on the project site. Therefore, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

Mitigation Measures: No mitigation measures are required.

2) 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 Impact With Mitigation Incorporated. In compliance with AB 52, the City of San Gabriel distributed letters notifying each tribe that requested to be on the City's list for the purposes of AB 52 of the opportunity to consult with the City regarding the proposed project. The letters were distributed by certified mail on August 23, 2021. The tribes had 30 days to respond to the City's request for consultation. The Gabrieleno Band of Mission Indians – Kizh Nation responded on September 2, 2021 requesting consultation and the City consulted with the tribe on October 21, 2021.

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the project site is located within the vicinity of known tribal cultural resources. However, no specific known tribal cultural resources were identified at the project site. As such, the project site is sensitive for unknown tribal cultural resources. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities, Mitigation Measure TCR-1 would ensure a qualified Native American Monitor is present during site disturbance activities. If evidence of potential subsurface tribal cultural resources is found during ground disturbing activities, Mitigation Measure TCR-1 would ensure that activities in the vicinity of the find are halted, appropriate parties are notified, and appropriate evaluation and treatment of said resource(s). To avoid impacting or destroying human remains and/or burial goods that may be inadvertently unearthed during project ground disturbing activities, Mitigation Measure TCR-2 would ensure activities in the vicinity of the find are halted, appropriate parties are notified, and appropriate evaluation and treatment of said resource(s) is conducted. If the human remains are determined to be Native American in origin, Mitigation Measure TCR-3 would ensure the Most Likely Descendant is notified and appropriate treatment of the remains is applied. With implementation of Mitigation Measures TCR-1 through TCR-3, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures:

TCR-1 Prior to the commencement of any ground disturbing activity at the project site, the project Applicant shall retain a Native American Monitor. The Native American monitor shall be selected from a list of tribes that have requested that a monitor be present on the project site, and in which the project site is within their ancestral region of occupation. Within 3 to 5 days of commencement of ground disturbing activities, the project applicant, or designee, shall provide a letter from the Native American Monitor, stating that they have been retained for the purposes of this mitigation measure, to the City of San Gabriel Planning and Building Department. The Native American Monitor shall be present on-site during the construction

phases that involve ground-disturbing activities. Ground disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Native American Monitor shall complete daily monitoring logs, to be submitted to the City of San Gabriel Planning and Building Department, that include descriptions of the day's activities (i.e., construction activities, locations, soil, and any cultural materials identified). Copies of monitor logs shall be provided to the project Applicant/City of San Gabriel upon written request to the Native American Monitor. The on-site monitoring shall end when all ground-disturbing activities for the project are completed, or when the Native American Monitor has indicated that all upcoming ground-disturbing activities have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the Native American Monitor and the qualified archaeologist (defined in Mitigation Measure CUL-1). If the resources are Native American in origin, the Native American Monitor shall identify the appropriate Tribe, in consultation with City staff and the Native American Heritage Commission, and such Tribe shall retain the resource(s) in the form and/or manner the Tribe deems appropriate (e.g., for educational, cultural, and/or historic purposes).

TCR-2 Upon discovery of human remains and/or burial goods, the Native American Monitor and/or qualified archaeologist (Mitigation Measure CUL-1) shall immediately divert work at minimum of 200 feet and place an exclusion zone around the discovery location. The Native American Monitor shall then notify the City of San Gabriel Planning and Building Department. the qualified archaeologist and the construction manager who shall notify the County coroner within 24 hours per Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the Native American Heritage Commission (NAHC) as mandated by State law who shall then appoint a Most Likely Descendent (MLD). 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-Tribal Cultural Resources) 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. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-3 Should the Gabrieleño Band of Mission Indians-Kizh Nation (the "Tribe") be identified as the Most Likely Descendant (MLD) by the Native American Heritage Commission (NAHC) upon discovery of human remains and/or burial goods identified as Tribal Cultural Resource(s), the Koo-nas-gna Burial Policy shall be implemented. 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. The prepared soil and cremation soils shall be treated in the same manner as bone fragments that remain intact. Cremations shall either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. In the event preservation in place is

not possible despite good faith efforts by the project Applicant and/or property owner, before ground-disturbing activities may resume on the project site, the project Applicant/property owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on-site, if possible. These items shall 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 property owner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe shall work closely with the qualified archaeologist (Mitigation Measure CUL-1) 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. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. No scientific studies or invasive and/or destructive diagnostics shall be performed on human remains.

4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
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 serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

***Less Than Significant Impact*.**

WATER

The project site is served by the San Gabriel County Water District (SGCWD). The project would construct private domestic, commercial, irrigation, and fire lines and would install a new service line to connect to existing SGCWD-water facilities in East Valley Boulevard. Payment of standard SGCWD water connection fees and ongoing user fees would ensure the project's impacts on existing water facilities are adequately offset. Additionally, SGCWD has issued a will serve letter to the project Applicant stating that SGCWD would be able to provide water services to the site upon compliance with all applicable construction design requirements and fees associated with new water connections.[1] Thus, it is not anticipated that project implementation would require construction of new or the expansion of existing water facilities. Less than significant impacts would occur in this regard.

WASTEWATER TREATMENT

The City of San Gabriel Public Works Department owns and maintains the City's sewer system network and the Sanitation Districts of Los Angeles County (LACSD) provides wastewater treatment services. Sewer collection pipelines are proposed on-site to connect to existing sewer pipelines in East Valley Boulevard. Wastewater generated in the City is treated by either LACSD's Whittier Narrows Water Reclamation Plant (WRP) located near the City of

[1] San Gabriel County Water District, *Will Serve Letter for 205 East Valley Boulevard, San Gabriel, CA, 91776*, August 12, 2021.

South El Monte, the Los Coyotes WRP located in the City of Cerritos, or the San Jose Creek WRP located adjacent to the City of Industry. The Whittier Narrows WRP has a capacity of 15 million gallons per day (mgd); the Los Coyotes WRP has a capacity of 37.5 mgd; and the San Jose Creek WRP has a capacity of 100 mgd. All three WRPs belong to LACSD's integrated network of facilities known as the Joint Outfall System.[2] Biosolids and wastewater flows that exceed the capacity of these upstream WRPs are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd.

As a mixed-use development, the project is anticipated to generate additional wastewater beyond existing conditions, however, the project is consistent with the site's land use designation and zoning and thus, was contemplated as part of the build out within San Gabriel and within the service area of LACSD. Additionally, the proposed project would be required to pay sewer connection fees and ongoing user fees. Municipal Code Section 154.002, *Sanitary Sewer Impact Fee*, also imposes a development impact fee on all new development in the City to fund a project's fair share of costs to upgrade the City's sewer system. Payment of development impact fee, standard sewer connection fees, and ongoing user fees would ensure the project's impacts on existing wastewater facilities are adequately offset. As such, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities.

STORMWATER

As detailed in Section 4.10, *Hydrology and Water Quality*, the project proposes to install low impact development (LID) biofiltration planter boxes along the site perimeter which would collect stormwater runoff, allow infiltration into the soil, and discharge remaining runoff into curb drains along the adjacent sidewalks. Flows in excess of the LID biofiltration planter box capacities would be collected in atrium drains and discharged to curb drains along the adjacent sidewalks. Upon project completion, stormwater runoff volumes and impervious surfaces on-site would be reduced compared to existing conditions.

The project's potential environmental impacts for construction of the abovementioned stormwater drainage improvements are analyzed as part of the proposed project in this Initial Study. Construction of the new storm drain improvements would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures in this Initial Study. Compliance with the relevant laws, ordinances, and regulations, as well as the specified mitigation measures, would ensure the project's construction-related environmental impacts associated with the proposed storm drain improvements are considered less than significant.

DRY UTILITIES

Natural gas services would be provided by the Southern California Gas Company (SCGC) and electricity services would be provided by Southern California Edison (SCE). AT&T and Charter Spectrum would provide telecommunication services to the site. The project would result in the construction of new private on-site dry utilities associated with electricity, natural gas and telecommunications; however, payment of standard utility connection fees and ongoing user fees would ensure impacts to these utility services are adequately offset. Additionally, SCE issued a will serve letter to the Applicant stating that SCE would be able to provide electricity service to the site upon compliance with applicable construction design requirements and fees associated with electrical utilities.[3]

The project's potential environmental effects for construction are analyzed throughout this Initial Study. Construction of the project's dry utilities would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures throughout this Initial Study. Compliance with the relevant

[2] Los Angeles County Sanitation Districts, *Figure 1.2-1 Joint Outfall System*, https://www.lacsd.org/home/showdocument?id=1808, accessed September 20, 2021.
[3] Southern California Edison, *Will Serve Letter for 205 East Valley Boulevard, San Gabriel, CA, 91776*, August 11, 2021

laws, ordinances, and regulations would ensure 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 project site is served by SGCWD. According to SGCWD's *2020 Urban Water Management Plan* (UWMP), the SGCWD depends primarily on groundwater supplies from the Main San Gabriel Basin (approximately 83 percent) and Raymond Basin (approximately 17 percent) as its existing and planned source of water supply.[4] According to the UWMP, SGCWD would be capable of providing adequate water supply to its service area under a normal supply and demand scenario, single dry-year supply and demand scenario, and multiple dry-year supply and demand scenarios through 2045. The UWMP water supply predictions are based on existing General Plan designations and account for increased demand as growth within the City occurs. Based on the General Plan, the project site is designated Commercial Specific Plan and the proposed mixed-use development is an allowed use under the Commercial Specific Plan designation; refer to Section 4.11, *Land Use and Planning*. Thus, buildout of the site as proposed was contemplated in the UWMP and SGCWD would be able to adequately accommodate the water demands of the proposed project. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. As stated in Response 4.19(a), the proposed project would result in the generation of additional wastewater above existing conditions. However, there is capacity for wastewater treatment at LACSD's various wastewater treatment plants to serve the project's anticipated demand in addition to existing commitments. Additionally, as the project is consistent with the site's land use designation and zoning, payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. As such, the project's potential impacts on wastewater treatment provider in this regard 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 (Athens) provides solid waste collection for the City, including the project site.[5] In 2019, a total of 33,195 tons of solid waste were disposed in 12 permitted landfills serving the City.[6] Among the 12 sites serving the City, Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, and Olinda Alpha Landfill admitted the majority of the City's waste; refer to Table 4.19-1, *Landfills Serving the City*.

[4] Stetson Engineers Inc., *San Gabriel County Water District 2020 Urban Water Management Plan*, Page 6-3, May 2021.
[5] City of San Gabriel, *Solid Waste & Recycling*, http://www.sangabrielcity.com/329/Solid-Waste-Recycling, accessed September 20, 2021.
[6] California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2019 for San Gabriel*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed September 20, 2021.

Construction

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 percent of waste produced is recycled, reduced, or composted and is included as Municipal Code Chapter 54, *Diversion of Construction and Demolition Waste*. The project would also be required to demonstrate compliance with the 2019 Green Building Code, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

Operation

Based on the project's air quality and greenhouse gas modeling, project operations is expected to generate approximately 34.63 tons of solid waste per year, or approximately 0.09 tons per day (tpd) without project design features related to recycling or composting. The Applicant proposes to recycle or compost approximately 10 to 40 percent of waste generated on-site. With the implementation of recycling and composting into the project's design and operation, the project is anticipated to generate approximately 31.12 tons of solid waste per year, or approximately 0.09 tpd; refer to Appendix B, *AQ/GHG/Energy Data*. This represents less than 0.01 percent of any landfill's maximum daily permitted throughput capacity identified in Table 4.19-1. As such, the project is not anticipated to 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. Additionally, Athens has issued a will serve letter to the Applicant to provide solid waste services.[7] Impacts in this regard would be less than significant.

Table 4.19-1
Landfills Serving the City

Landfill/Location	Amount Disposed by City in 2019 (tons per day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Mid-Valley Sanitary Landfill 2390 North Alder Avenue Rialto, CA 92377	17,874	7,500	61,219,377	04/01/2045
San Timoteo Sanitary Landfill San Timoteo Canyon Road Redlands, CA 92373	5,350	2,000	12,360,396	01/01/2039
Olinda Alpha Landfill 1942 North Valencia Avenue Brea, CA 92823	4,164	8,000	17,500,000	12/31/2036
El Sobrante Landfill 10910 Dawson Canyon Road Corona, CA 91719	2,755	16,054	143,977,170	01/01/2051
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Access Road Irvine, CA 92618	1,630	11,500	205,000,000	12/31/2053

[7] Athens Services, *Will Serve Letter for 205 East Valley Boulevard, San Gabriel, CA, 91776*, August 27, 2021.

Table 4.19-1 [cont'd]
Landfills Serving the City

Landfill/Location	Amount Disposed by City in 2019 (tons per day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Chiquita Canyon Sanitary Landfill 29201 Henry Mayo Drive Castaic, CA 91384	1,269	12,000	60,408,000	01/01/2047
Victorville Sanitary Landfill 18600 Stoddard Wells Road Victorville, CA 92307	634	3,000	79,400,000	10/01/2047

Notes:
1. Antelope Valley Public Landfill, Lancaster Landfill and Recycling Center, Savage Canyon Landfill, Simi Valley Landfill & Recycling Center, Southeast Resource Recovery Facility and Sunshine Canyon City/County Landfill are excluded from Table 4.19-1 as these facilities accepted less than one percent of the City's solid waste in 2019 (the last available reporting year). Additionally, Azusa Land Reclamation Co. Landfill is also excluded as it has been inactive since December 2009.

Sources:
1. California Department of Resources Recycling and Recovery, *SWIS Facility/Site Search*, https://www2.calrecycle.ca.gov/SWFacilities/Directory/, accessed September 20, 2021.
2. California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2019 for San Gabriel*, https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed September 20, 2021.
3. California Department of Resources Recycling and Recovery, *Transported Solid Waste*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Statewide/TransportedSolidWaste, accessed September 20, 2021.

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 proposed project would be required to comply with all Federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act of 1989 and City recycling programs. Specifically, pursuant to Municipal Code Chapter 54, *Diversion of Construction and Demolition Waste*, at least 50 percent of construction and demolition waste generated shall be diverted from landfilling by using recycling, reuse, or other diversion programs. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact 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?

No Impact. According to the California Department of Forestry and Fire Protection *Los Angeles County Very High Fire Hazard Severity Zones in LRA Map*, the City of San Gabriel is not located within or near a State responsibility area nor is the City classified as a very high fire hazard severity zone.[1] As such, project implementation would have no impact in this regard.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Refer to Response 4.20(a).

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?

No Impact. Refer to Response 4.20(a).

***Mitigation Measures*:** No mitigation measures are required.

[1] California Department of Forestry and Fire Protection, *Los Angeles County Very High Fire Hazard Severity Zones in LRA Map*, https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf, September 2011.

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

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
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 species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. As concluded in Section 4.4, *Biological Resources*, the project site is developed and located within an urbanized area of the City. Based on the site's condition, no sensitive plant or animal species would be present. Thus, the project would have no impacts on sensitive plant or animal species. Additionally, project implementation is not anticipated to result in adverse impacts to known cultural or tribal cultural resources; refer to Section 4.5, *Cultural Resources*, and Section 4.18, *Tribal Cultural Resources*. However, in the unlikely event that buried archaeological resources are encountered during ground disturbance activities, Mitigation Measure CUL-1 would require all project construction efforts to halt would require all construction work to halt until a qualified archaeologist can evaluate the find. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities, Mitigation Measure TCR-1 would ensure a qualified Native American Monitor is present during site disturbance activities. If human remains and/or burial goods identified as tribal cultural resources are inadvertently found, Mitigation Measure TCR-2 would ensure activities in the vicinity of the find are halted, appropriate parties are notified, and appropriate evaluation and treatment of said resource(s) is conducted. If the human remains are determined to be Native American in origin, Mitigation Measure TCR-3 would ensure the Most Likely Descendant is notified and appropriate treatment of the remains is applied. In the unlikely event that paleontological resources are encountered during project construction, Municipal Code Section 153.630, *Identification, Documentation, and Management of Archaeological, Native American, and Paleontological Resources* would ensure that a qualified paleontologist submits a report including a statement on the significance of the discovery and recommended a course of action. Therefore, the proposed 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. Impacts would be less than significant with mitigation incorporated in this regard.

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a proposed 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 Section 4.1 through Section 4.20, the proposed project would not result in any significant impacts in any environmental categories with implementation of project mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects. Impacts would be less than significant with mitigation incorporated in this regard.

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 proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed 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 and implementation of project mitigation measures. Impacts would be less than significant with mitigation incorporated in this regard.

4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration.

Athens Services, *Will Serve Letter for 205 East Valle Boulevard, San Gabriel, CA, 91776, August 27*, 2021.

California Air Resources Board, *2017 Scoping Plan*, November 2017.

_____. *AQMIS2: Air Quality Data*, https://www.arb.ca.gov/aqmis2/display.php?param=CO&year=2020&units=007&report=SITE1YR&statistic=DMAX&site=2160&ptype=aqd, accessed September 7, 2021.

_____. *California Greenhouse Gas Emissions for 2000 to 2019*, https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf, accessed August 23, 2021.

California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed September 17, 2021.

_____. *Special Report 143 Part IV, Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region, Plate 4.11, El Monte Quadrangle*, 1982.

_____. *Updated Designation of Regionally Significant Aggregate Resources in the San Gabriel Valley Production-Consumption Region, Los Angeles County*, April 2014.

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5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City of San Gabriel prepare a mitigated negative declaration for the 205 East Valley Boulevard Project. We find that the proposed project could have a significant effect on a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. As such, we recommend that the second category be selected for the City of San Gabriel's determination (see Section 6.0, *Lead Agency Determination*).

4/6/2023
Date

Frances Yau, AICP, Project Manager
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6.0 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: 

Title: Associate Planner

Printed Name: Anthony Alvarado

Agency: City of San Gabriel

Date: 4/6/2023

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