Rubio Village Mixed-Use Project

Initial Study/
Mitigated Negative Declaration

August 2023

Lead Agency:

City of San Gabriel
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San Gabriel, CA 91776
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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

This Initial Study has been conducted in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). Pursuant to CEQA Guidelines Section 15063, this Initial Study has been conducted to determine if the proposed Rubio Village Mixed-Use Project ("Project") would have a significant effect on the environment. The Project would be located at 201-217 South San Gabriel Boulevard, on an approximately 2.9-acre property (Assessor Parcel Numbers [APN] 5367-019-001, -003, -010, -016, -018, -023, -024, -030, -031, -032, -033, -034, -035, -036, -037, -038,- 039; 5367-020-004, -005), in the City of San Gabriel ("City"). The Applicant proposes to develop three buildings consisting of 225 multi-family residential units and approximately 13,449 square feet (SF) of commercial uses.

Pursuant to CEQA Guidelines Section 15063(c), the purposes of an Initial Study are to:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration (ND);
- Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide documentation of the factual basis for the finding in a ND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- Determine whether a previously prepared EIR could be used with the project.

This Initial Study is intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project. Responsible agencies would comply with CEQA by considering this environmental analysis for discretionary actions associated with Project implementation, if any.

CEQA Guidelines Section 15063(g) specifies that as soon as a Lead Agency has determined that an Initial Study will be required for a project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by a project to obtain their recommendations as to whether an EIR, Mitigated Negative Declaration (MND), or ND should be prepared.

1.2 Project Site Background

On April 3, 2007, the City of San Gabriel City Council approved the San Gabriel Center Project and certified the Final EIR (State Clearinghouse [SCH] No. 2006061078). The San Gabriel Center Project Final EIR analyzed a mixed-use project consisting of 159 dwelling units, 14,190 square

feet of retail space, and 4,630 square feet of restaurant uses. The San Gabriel Center Project Final EIR also included approval of the following entitlement applications: Zone Change from Retail Commercial (C-1) to Retail Commercial with Planned Development Overlay (C-1(P-D)); a Conditional Use Permit to allow for development of a mixed-use development within the C-1(P-D) district; a Tentative Tract Map for the proposed condominium portion; an Owner Participation Agreement to authorize the terms for use of affordable housing funding; and a Precise Plan for review and approval of the project design.

In February 2015, under the Addendum to San Gabriel Center Project Final EIR, a different developer (Landwin, LLC) proposed to build essentially the same project known as the Rubio Village project, which would consist of 159 dwelling units, 10,230 square feet of retail space, and 6,319 square feet of restaurant uses.

In May 2016, under the Second Addendum to the San Gabriel Center "Rubio Village" Project Final EIR, the applicant proposed the same development program as under February 2015 project, with the primary modification being the 24 residential units proposed over the Rubio Wash now being relocated throughout the development.

In May 2022, Rubio Village LLC (Applicant) proposed to develop a four-story mixed-use building consisting of 179 residential condominium dwelling units, 8,038 square feet (SF) of retail space, and 5,956 SF of restaurant uses. The May 2022 project was exempt from additional review under CEQA as the project would have no additional impacts associated with the proposed revisions. The project was approved on May 10, 2022.

1.3 Summary of Findings

Pursuant to CEQA Guidelines Section 15367, the City, as Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in **Section 3.2: Environmental Factors Potentially Affected**. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Tribal Cultural Resources

As set forth in CEQA Guidelines Section 15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant effects, but (1) revisions…would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and (2) there is no substantial evidence, in light of the whole

record before the agency, that the project as revised may have a significant effect on the environment.

1.4 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt an MND has been provided to the Clerk of the County of Los Angeles and mailed to all Responsible Agencies and Trustee Agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 30-day public review period has been established for the IS/MND in accordance with CEQA Guidelines Section 15073. During the public review period, the IS/MND, including the Technical Appendices, was made available for review on the City website, at:

https://www.sangabrielcity.com/731/Current-Projects-Programs

In reviewing the IS/MND, affected Responsible Agencies, Trustee Agencies, and the interested public should focus on the document's adequacy in identifying and analyzing the Project's potential environmental effects and the ways in which the potentially significant effects can be avoided or mitigated. Written comments on this IS/MND may be sent to:

Samantha Tewasart, Planning Manager
City of San Gabriel, Community Development Department
425 South Mission Drive
San Gabriel, CA 91776
Email: stewasart@sgch.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If no substantial new environmental issues have been raised or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, cites the State CEQA Guidelines to which the proposed Project is subject, and summarizes the IS/MND's conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the IS/MND's intended uses, including a list of anticipated permits and other approvals.

Section 3.0: Environmental Checklist Form provides the Project background and an overview of potential impacts that may or may not result from Project implementation.

Section 4.0: Evaluation of Environmental Impacts provides an analysis of potential environmental impacts identified in the environmental checklist.

2.0 PROJECT DESCRIPTION

2.1 Location

The Project Site is located in the City of San Gabriel (City), approximately 11 miles northeast of the downtown Los Angeles area; see **Exhibit 2-1: Regional Vicinity Map**. The approximately 2.9 acre Project Site (APNs 5367-019-001, -003, -010, -016, -018, -023, -024, -030, -031, -032, -033, -034, -035, -036, -037, -038,- 039; 5367-020-004, -005) located at 201-217 S. San Gabriel Boulevard. The Project Site is located at the southwest corner of the intersection of East Live Oak Street and South San Gabriel Boulevard. The Project Site is generally bound by East Live Oak Street to the north, South San Gabriel Boulevard to the east, residential and commercial uses to the south, and South Pine Street to the west.

Regional access to the Project Site is provided via the Foothill Freeway (Interstate 210 [I-210]) north of the Project Site and the San Bernardino Freeway (I-10) south of the Project Site. Local access to the Project Site is provided via East Live Oak Street to the north and South San Gabriel Boulevard to the east.

2.2 Environmental Setting

The City encompasses approximately 4.15 square miles in the San Gabriel Valley. The City is bordered by 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 City is fully urbanized with a mix of residential, retail commercial, office, and industrial uses. Open space areas are generally located north of East Live Oak Street. City parks are located within residential neighborhoods north of East Live Oak Street.

2.2.1 On-Site and Surrounding Land Uses

As depicted on **Exhibit 2-2: Local Vicinity Map**, the Project Site is undeveloped and is fenced off on all sides. On-site topography is relatively flat. Low-lying shrubs, weeds, and non-native grassland are scattered throughout the Project Site. The Project Site currently consists of 44 trees represented by 13 species: 9 coast live oak (*Quercus agrifolia*), 2 trees of heaven (*Ailanthus altissima*), 1 redbud (*Cercis species*), 1 lemon tree (*Citrus limon*), 5 carrotwood trees (*Cupaniopsis anacardioides*), 1 Nichol's willow-leafed peppermint (*Eucalyptus nicholii*), 1 edible fig (*Ficus carica*), 5 Shamel ash trees (*Fraxinus uhdei*), 1 eastern black walnut (*Juglans nigra*), 6 crape myrtle trees (*Lagerstroemia indica*), 1 Peruvian pepper tree (*Schinus molle*), 3 Chinese elms (*Ulmus parvifolia*), and 8 Mexican fan palms (*Washingtonia robusta*). (see **Appendix B: Arborist Reports)**. Commercial uses are located north and east of the Project Site. Commercial uses and high-density residential uses are located south of the Project Site. Multi-family residential uses are located west of the Project Site. The Rubio Wash drainage channel traverses the site from northwest to southeast. The Union Pacific Railroad tracks are located approximately 0.5 miles south of the Project Site.

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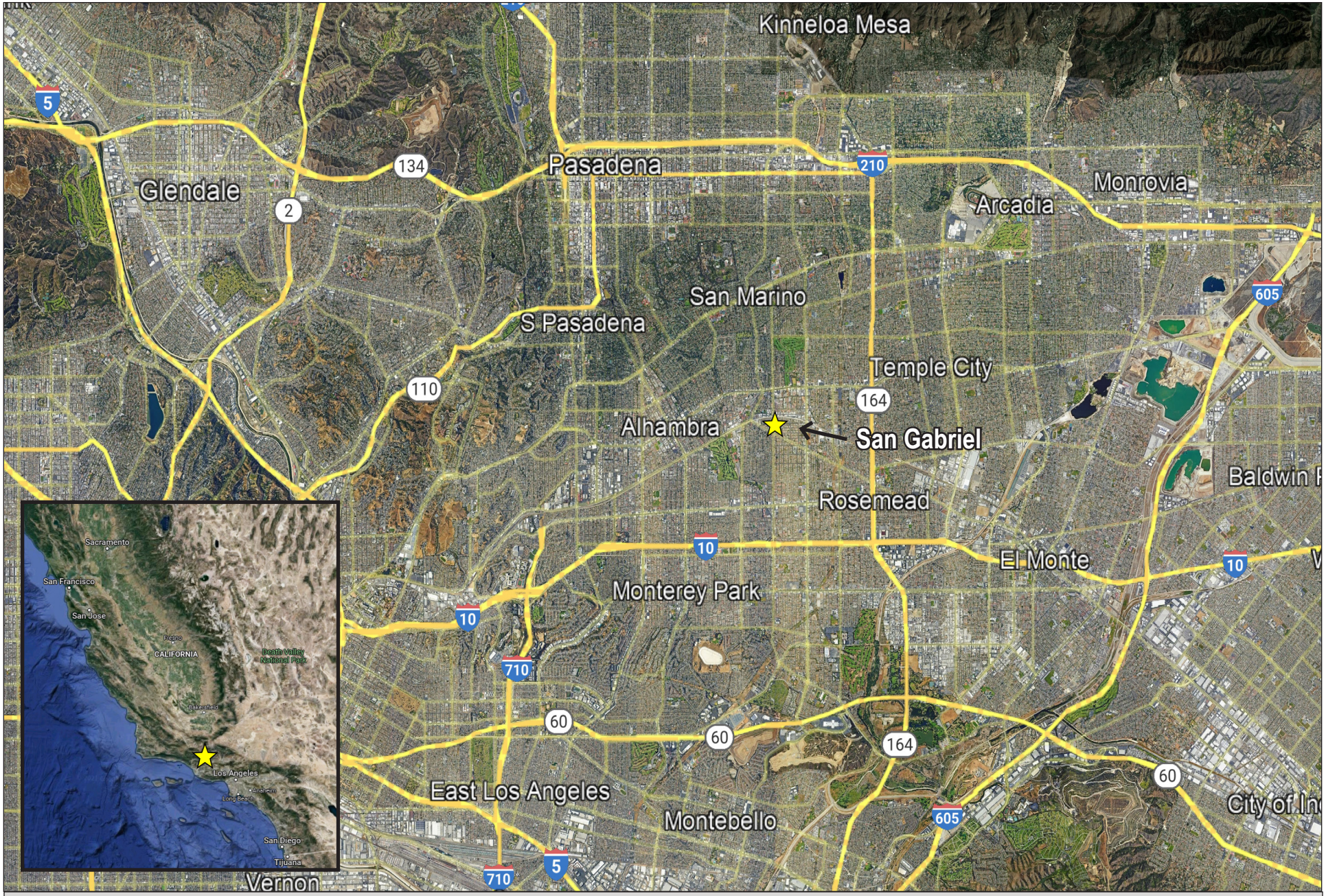

EXHIBIT 2-1: REGIONAL VICINITY MAP

Rubio Village Mixed-Use Project

NOT TO SCALE

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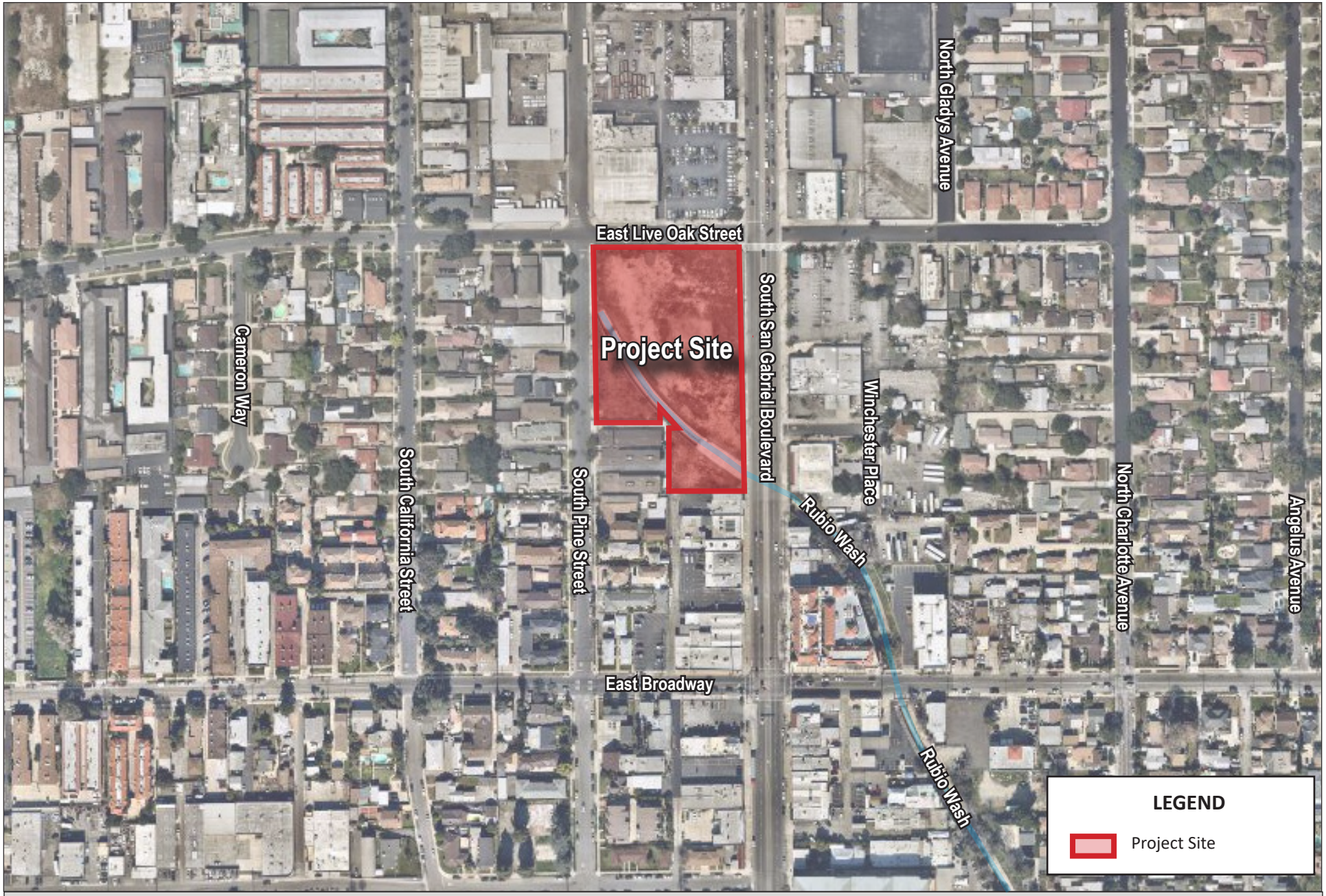


EXHIBIT 2-2: LOCAL VICINITY MAP

Rubio Village Mixed-Use Project

NOT TO SCALE

Kimley»Horn

Table 2-1: On-Site and Surrounding Land Uses summarizes the on-site and surrounding land uses.

Table 2-1: On-Site and Surrounding Land Uses

Description	Existing Land Use	Zoning[1]
Project Site	Undeveloped	Mixed-Use PD (Planned Development Overlay)
North	Commercial	C-1 (Retail Commercial)
South	Multi-family Residential and Commercial	C-1 (Retail Commercial)
East	Commercial	C-1 (Retail Commercial)
West	Multi-family Residential	R-3 (Multiple Family Residential)

Notes:
1. City of San Gabriel, City of San Gabriel Zoning Map, 2016, https://www.sangabrielcity.com/DocumentCenter/View/812/Zoning-Map?bidId=. Accessed June 9, 2023.

2.2.2 General Plan and Zoning

The Project Site has a General Plan Land Use designation of General Commercial.[1] The Project Site is zoned Mixed-Use PD (Planned Development Overlay).[2] According to the San Gabriel Municipal Code (SGMC) Section 153.280, the PD Overlay zoning designation is intended to allow large-scale development (one acre or larger) in specific corridors within the City. Any use permitted under Residential, Commercial, Mixed-use zone may be permitted in a Mixed-Use PD Overlay zone.

2.3 Project Characteristics

2.3.1 Project Overview

The Project would develop 3 buildings consisting of 225 multi-family residential units and approximately 13,449 SF of commercial uses (restaurant/retail) in 5 spaces. The 225 multi-family residential units are comprised of 12 studios, 179 one-bedroom units, 31 two-bedroom units, and 3 three-bedroom units. The Project would include 191,453 SF of residential uses (including amenities), 13,449 SF of commercial uses, and 101,891 SF of above-ground parking, resulting in a total of 306,793 SF and a floor area ratio (FAR) of 2.44:1. As depicted in **Exhibit 2-3: Conceptual Site Plan**, the Project would locate one building (Building A) north of the Rubio Wash, fronting East Live Oak Street. The other two buildings (Building B fronting Pine Street and Building C fronting South San Gabriel Boulevard) would be south of the Rubio Wash. See **Exhibit 2-4: Project Elevations** for depictions of scale and massing of the three proposed buildings.

Building A would be a six-floor building consisting of 206 multi-family residential units comprised of 12 studios, 163 one-bedroom units, and 31 two-bedroom units. The ground floor would include 113 vehicle parking spaces, bike racks for both the residential and commercial uses (see Section 2.3.4 for more detail), a 1,261 SF amenity space/multi-purpose room/gym for the

[1] City of San Gabriel, Land Use Plan, 2004, https://www.sangabrielcity.com/DocumentCenter/View/813/Copy-of-2004-GP-Land-Use-Map-SIGNED?bidId=. Accessed June 9, 2023.

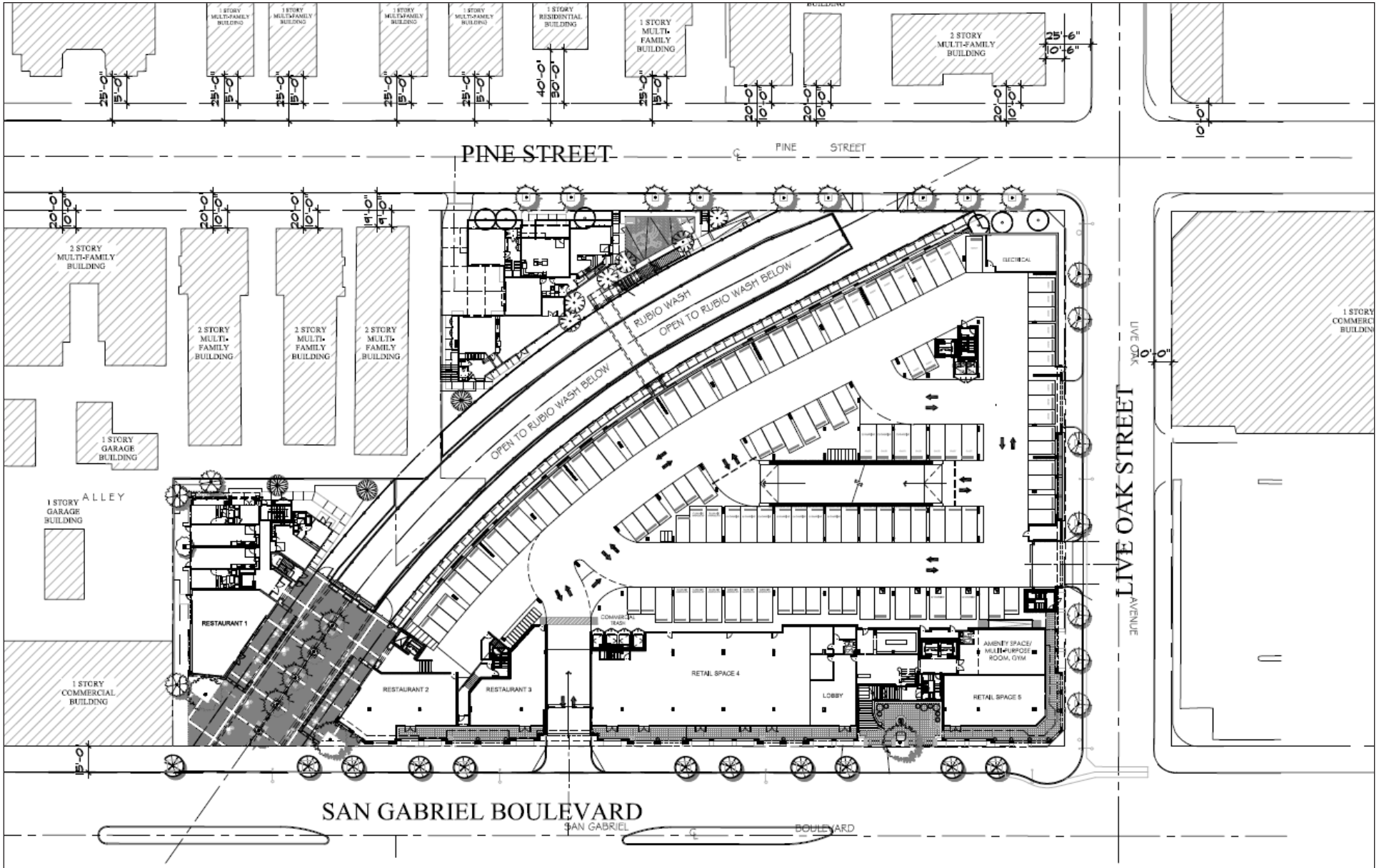
[2] It should be noted that the City's 2016 Zoning Map shows that the Project Site is zoned C-1 (Retail Commercial). Under State Clearinghouse (SCH) No. 2006061078, a Zone Change was approved for the Project Site which redesignated the Project Site to Planned Development Overlay (C-1(P-D)).

residents, a 1,682 SF retail space, a 3,240 SF residential lobby, a 6,316 SF retail space, and two restaurant spaces (2,000 SF and 1,722 SF). The second floor would include 102 vehicle parking spaces, residential units, and a 4,240 SF amenity space on the southern corner of the building. The third through sixth floor would comprise of only residential units. Two subterranean levels of parking would also be included. The first subterranean level would include 134 parking spaces long-term residential bike racks, and 49 storage lockers. The second subterranean level would include 83 parking spaces, long-term residential bike racks, and 87 storage lockers. Building A would have a maximum height of 70 feet and 7 inches to the top of the roof. Building A would be 77 feet and 2 inches inclusive of the feature tower roof.

Building B would be a two-story building consisting of 3 three-bedroom townhome units. Two-car garages would be attached to each townhome. Long-term residential bike racks and open space would be provided adjacent to the Rubio Wash.

Building C would be a four-story building consisting of 16 multi-family residential units, all of which would be one-bedroom units. The ground floor would include a 1,729 SF restaurant space and residential units. The remaining floors would only consist of residential units. Short-term residential bike racks and open space would be provided adjacent to the Rubio Wash.

The Project would also include signage, security gates, and trash enclosures. The buildings' rooftops would be solar ready to include roof blocking, platform supports, and vacant conduits. The Project would be located adjacent to single-story scaled commercial and associated surface parking to the north and east and one- and two-story multi-family residential to the west and south. Buildings B and C would serve as transitions and buffers between the one- and two-story residential buildings to the six-story Building A.



Source: LCRA, INC., Conceptual Site Plan, dated May 15, 2023

EXHIBIT 2-3: CONCEPTUAL SITE PLAN
Rubio Village Mixed-Use Project

NOT TO SCALE

Kimley»Horn

San Gabriel Boulevard Elevation

Live Oak Avenue Elevation

Pine Street Elevation

Source: LCRA, INC., Colored Elevations, dated May 15, 2023

EXHIBIT 2-4: PROJECT ELEVATIONS
Rubio Village Mixed-Use Project

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2.3.2 Open Spaces and Landscaping

The Project would be required to provide a total of 22,500 SF of publicly accessible open space area. The Project would provide 43,810 SF of open space, comprised of 27,048 SF of ground floor open space and 16,762 SF in a third floor courtyard. The Project would also include 10,667 square feet of private open space area in the form of residential balconies and patios. The Project includes open space along East Live Oak Street, South San Gabriel Boulevard, and along the Rubio Wash. Two amenity spaces would be provided in Building A on the ground floor and second floor.

The proposed vegetation includes various trees, vines, shrubs, and other ground cover vegetation. The Project's landscaping would require very low, low, and moderate water usage. Of the 44 trees on-site, 16 trees would be removed and 17 trees would be protected in place. 106 trees would be planted on the ground floor, and 25 trees would be planted on the third floor courtyard.

2.3.3 Parking and Access

Based on the Project's residential units and commercial uses, the Project would be required to provide 424 vehicle parking spaces. The Project would provide a total of 438 vehicle parking spaces (351 for residential and 87 for commercial) consisting of 83 spaces on Building A's second subterranean level, 134 spaces on Building A's first subterranean level, 113 spaces on Building A's ground floor, 102 spaces on Building A's ground floor, and 6 spaces in Building B's private garages. Of the 438 vehicle parking spaces, 45 parking spaces would be designated for electric vehicles (EV) and 8 spaces would be designated for clean air, vanpool, and EV. Parking on the two subterranean levels and second above-ground floor would be for residents. Parking for the commercial uses will be located on the ground floor only. The Project also proposes a total of 76 bicycle parking spaces consisting of 56 long-term residential, 4 long-term commercial, 8 short-term residential (guest), and 8 short-term commercial.

Vehicular access to Building A would be provided by one driveway on East Live Oak Street and one driveway on South San Gabriel Boulevard. A driveway leading to the subterranean and above-ground parking levels would be provided by the driveway off of East Live Oak Street. Both driveways would lead to on-grade parking. A center driveway ramp would lead to the subterranean parking levels. An additional driveway would be located on Pine Street to serve Building B. A third driveway on South San Gabriel Boulevard would connect to the ground floor circulation by Building A. Access to Buildings B and C would be provided via pedestrian bridges over the Rubio Wash.

2.3.4 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.

- Wastewater. The City of San Gabriel Public Works Department owns and maintains the City's sewer system network. The Los Angeles County Sanitation District (LACSD) provides

wastewater treatment services. Buildings A and C would be served by an existing 8-inch sanitary sewer main in South San Gabriel Boulevard. Building B would be served by an existing 8-inch sanitary sewer main in Pine Street.

- Drainage. The Project's surface runoff will discharge to an existing sewer main on South San Gabriel Boulevard.
- Dry Utilities. Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) would provide electricity and natural gas services to the Project Site, respectively.

2.4 Project Construction Activities and Phasing

Project construction is anticipated to occur as a single-phase, lasting approximately 25 months, beginning as early as February 2024 and ending as early as February 2026. For purposes of this environmental analysis, opening year is assumed to be 2026.

Grading for the proposed improvements would require cut and fill to create building pads. Maximum excavation depth would be 24.5 feet below ground surface, inclusive of foundations, pads, piers, and continuous footing. Project construction is estimated to require approximately 26,637 cubic yards (CY) of cut, 4,842 CY of fill, and 21,795 CY of export. All infrastructure (i.e., storm drain, water, wastewater, and dry utilities) would be installed during grading. Final grading plans would be approved by the City before Grading Permit issuance.

2.5 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. Other agencies in addition to the City are expected to use this IS/MND in their decision-making process. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Adoption of the Initial Study/Mitigated Negative Declaration;
- Amendment to Plan Development Overlay;
- Vesting Tentative Tract Map;
- Development Agreement;
- Precise Plan of Design;
- Master Sign Program;
- Tree Removal Permit;
- Public Art; and
- Issuance of applicable grading and building permits.

3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 Background

1.	**Project Title:** Rubio Village Mixed-Use Project
2.	**Lead Agency Name and Address:** City of San Gabriel 425 Mission Drive San Gabriel, CA 91776
3.	**Contact Person and Phone Number:** Samantha Tewasart, Planning Manager Tel: 626.308.2806 Email: stewasart@sgch.org
4.	**Project Location:** 201-217 South San Gabriel Blvd, San Gabriel, CA 91776
5.	**Project Sponsor's Name and Address:** Rubio Village LLC 19112 Gridley Road, Suite 105 Cerritos, CA 90703
6.	**General Plan Designation:** Mixed-Use PD (Planned Development Overlay)
7.	**Zoning:** Mixed Use PD (Planned Development Overlay)
8.	**Description of Project:** See Section 2.3: Project Characteristics
9.	**Surrounding Land Uses and Setting:** See Section 2.2.1: On-Site and Surrounding Land Uses
10.	**Other public agencies whose approval is required (e.g., permits):** N/A
11.	**Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of the significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** California Native American tribes have been contacted for consultation pursuant to Assembly Bill (AB) 52. For further details, see Section 4.18: Tribal Cultural Resources.

3.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ 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

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.	X
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 or a 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.	

CITY OF SAN GABRIEL

Samantha Tewasart
Planning Manager

8/8/2023
Date

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on site and off site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project 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 Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Impact Analysis

4.1a Would the Project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. The Project Site is in a highly urbanized area of San Gabriel and is surrounded by residential and commercial uses.

Based on a review of the General Plan, the San Gabriel Mountains would be the closest scenic vista visible from the Project Site, located approximately eight miles north. Although the distant San Gabriel Mountains are visible from the Project Site and the surrounding area, the views are broad. The views from the Project Site are not considered unique and are not recognized by the City as a scenic vista. The proposed buildings would serve as a transition or buffer between residential uses west of the site and commercial uses north, east, and south of the site. The Project Site would be improved and enhanced from an underdeveloped site to a well-designed and maintained mixed-use village. Thus, the Project would have no impact on a scenic vista.

4.1b Would the Project 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.[3] The closest officially designated or eligible, State scenic highway is California State Route 110 (SR-110), located over seven miles northwest of the Project. The Project is not visible from SR-110 due to the distance, intervening topography, structures, and vegetation. Therefore, the Project would have no impact on scenic resources within a State scenic highway.

4.1c If in a non-urbanized area, would the Project 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 in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project is located in an urbanized area and is currently undeveloped. Land uses surrounding the Project Site include residential, and commercial uses. The Project proposes to construct three buildings consisting of a mix of residential and commercial. The maximum proposed building height would be approximately 77 feet. The proposed Project would introduce a mixed-use development that would complement the existing surrounding land uses. The Project's buildings would serve as a transition between the multi-family residential to the west of the Project Site and the commercial uses to the north, east, and south of the Project Site. The Project would develop an underutilize lot located by the Rubio Wash, and would integrate the Rubio Wash to the Project Site with additional landscaping and ornamental features. The Project would also include a Precise Plan of Design, Master Sign Program, and Public Art, and would require the City and all applicable departments to review the plans to determine compliance with development standards. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts on scenic quality would be less than significant.

4.1d Would the project 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 Project Site is located in an urbanized area with existing sources of light and glare. Existing sources include streetlights and vehicular lights primarily along East Live Oak Street and San Gabriel Boulevard, exterior and interior lighting of adjacent commercial and residential buildings, and commercial signage lighting. The proposed Project would generate lighting from interior sources, such as lighting from building interiors that would pass through windows, and from exterior sources, such as signage and building illumination, security lighting, parking lot lighting, and landscape lighting.

During construction, the proposed Project would be required to comply with exterior lighting, security lighting, and shielded lighting requirements included in the SGMC Sections 150.218 and 150.219. Lighting would be required to be shielded and/or aimed downwards to minimize direct

[3] California Department of Transportation, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 15, 2023.

illumination and to preclude light pollution or trespass onto adjacent properties. Materials would also be required to include low-reflectivity glass/or materials with low-reflective coating to reduce impacts from glare onto surrounding areas. The combination of the cumulative projects and the proposed Project would not create a discernable increase in light and glare. In addition, the City's Planning and the Building and Safety Divisions would review any proposed lighting to ensure conformance with the California Green Building Standards Code (CALGreen Code), such that only the minimum amount of lighting is used and no light spillage occurs. Further, although the proposed Project would introduce new light sources, the surrounding area is urban and already illuminated. Therefore, the proposed lighting conditions would be similar to the existing conditions of the Project Site's surroundings, and impacts would be less than significant.

4.2 Agricultural and Forestry Resources

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

Impact Analysis

4.2a Would the Project 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?

4.2b Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e Would the Project 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. According to the California Department of Conservation, the Project Site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland).[4] Further, there are no lands subject to a Williamson Act Contract within the City.[5] The Project Site is zoned Mixed-Use PD, which does not permit farmland or agricultural uses. Further, no agricultural, forest land, or timberland zoning exists in the City. Therefore, the Project would have no potential to convert farmlands, no impacts on Williamson Act contracts or agricultural resources, would not conflict with forest land or timber land zoning, result in the loss of forest land, or the conversion of farmland or forest land.

4.3 Air Quality

An air quality analysis was prepared for the proposed Project by Kimley-Horn and Associates, Inc. (Kimley-Horn). The air quality modeling outputs and results are included in **Appendix B: Air Quality Technical Memorandum**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	

[4] California Department of Conservation, California Important Farmland Finder, 2023, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed July 16, 2023.

[5] California Department of Conservation, Williamson Act/Land Conservation Act, 2016, http://www.conservation.ca.gov/dlrp/lca. Accessed July 16, 2023.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Project Site is located within the South Coast Air Basin, which is a distinct geographic subarea within SCAQMD's jurisdiction. The SCAQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM10), and particulate matter 2.5 microns or less in diameter (PM2.5). The thresholds apply to both project construction and operation within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. However, ultimately the City, as the Lead Agency under CEQA, determines the thresholds of significance for impacts. If a project proposes development in excess of the established thresholds, as outlined in **Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds** a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts**.**

Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors (Regional)	Average Daily Emissions (pounds/day)	
	Construction-Related	Operational-Related
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter up to 10 Microns (PM10)	150	150
Particulate Matter up to 2.5 Microns (PM2.5)	55	55
Sulphur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550

Notes:
1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

Source: South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, 2019.

Localized Carbon Monoxide

In addition to the daily thresholds listed above, the Project would be subject to the California Ambient Air Quality Standards (CAAQS). These are addressed through an analysis of localized carbon monoxide (CO) impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million (ppm)
- 8-hour = 9 ppm

The significance of localized impacts depends on whether ambient CO levels near a project site exceed State and federal CO standards. The South Coast Air Basin has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed Localized Significance Thresholds (LSTs) for emissions of NO_2, CO, PM10, and PM2.5 generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or State ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor.[6] A LST analysis for construction is applicable for all projects that disturb five acres or less on a single day. The Project Site is located within SCAQMD SRA 8 (West San Gabriel Valley), which includes a monitoring station that provides the representative ambient concentrations for the City.

Impact Analysis

4.3a Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is in the South Coast Air Basin, which includes all of Orange County and the non-desert portions of San Bernardino, Los Angeles, and Riverside counties. The Air Basin is approximately 6,600 square miles extending from the Pacific Ocean to the San Gabriel, San Bernardino, and San Jacinto Mountains. The South Coast Air Basin is a coastal plain with broad valleys and low hills, and semi-arid climate. The SCAQMD and the California Air Resources Board (CARB) monitor the South Coast Air Basin's air quality.

The SCAQMD and the Southern California Association of Governments (SCAG) prepare the Air Quality Management Plan (AQMP). AQMPs describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. An AQMP's primary purpose is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act (FCAA) and California Clean Air Act (CCAA). An AQMP

[6] The SCAQMD maintains a network of air quality monitoring stations located throughout the SCAB and has divided the SCAB into 38 SRAs in which 38 monitoring stations operate. The LSTs were developed by the South Coast AQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor.

uses the term "non-attainment" to describe an air basin that exceeds one or more federal or State ambient air quality standards. In addition, the goal of AQMPs is to ensure that an area maintains a healthful level of air quality based on the National Ambient Air Quality Standards (NAAQS) and the CAAQS.

The current plan is the 2022 AQMP, which was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP was developed to address the requirements for meeting the 2015 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour O_3 standard. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories.

In order for a project to be consistent with the AQMP, it would have been included in the projections used to formulate the AQMP. According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the AQMP assumptions and objectives, and therefore if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The SCAQMD's CEQA Air Quality Handbook identifies two key indicators of consistency with the AQMP:

- **Consistency Criterion No. 1**: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.
- **Consistency Criterion No. 2**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project buildout phase.

With respect to Consistency Criterion No. 1, based on the air quality modeling analysis conducted for the proposed project, project construction and operation would not result in significant impacts based on the SCAQMD thresholds of significance (see **Threshold 4.3b**), below for a discussion of the construction and operational modeling methodology, inputs, and results); therefore, project construction and operation would not increase the frequency or severity of existing air quality violations. The proposed project would not contribute to the exceedance of any air pollutant concentration standards.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region.

Therefore, projects that are consistent with the applicable assumptions used in AQMP development would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts; SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the increase in vehicle miles traveled (VMT) and/or population generated by said project would have been included in the applicable AQMP's assumed VMT and population growth.

The Project's proposed land uses would be consistent with the General Plan's land use designations, which are the basis for the AQMP. Therefore, the Project's forecast population growth and VMT would be consistent with the AQMP's assumed population growth and VMT for the Project Site. It is also noted that the Project's construction and operational air emissions would not exceed the SCAQMD regional thresholds, and localized emissions during construction and operations would not exceed South Coast AQMD LST thresholds; see **Thresholds 4.3b** and **4.3c** below for further analysis. As such, the Project would be consistent with Criterion No. 2.

Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

4.3b Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact.

Construction Emissions

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and NO_X, PM10, and PM2.5). Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the amount of pollutants generated exceeds the SCAQMD's thresholds of significance. Sources of emissions during construction include site grading, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water. Sensitive land uses surrounding the Project Site consist mostly of residential communities located adjacent to the Project Site, including multi-family residences approximately 65 feet west to the Project Site and 18 feet south of the Project Site.

Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix B** for more information regarding the construction assumptions used in this analysis.

Table 4.3-2: Construction-Related Emissions (Maximum Pounds Per Day) presents the Project's estimated maximum daily construction-related emissions and indicates that all criteria pollutant emissions would remain below their respective thresholds. While impacts would be less than significant, the Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, to further reduce specific construction-related emissions. The Project's emissions would not worsen ambient air quality, create additional violations of federal and State standards, or delay SCAB's AQMP goal for meeting attainment standards. Therefore, the Project's construction-related air quality impacts would be less than significant.

Table 4.3-2: Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
2024	5.8	59.7	56.3	0.1	11.0	6.2
2025	10.4	21.6	50.1	0.1	6.2	2.0
2026	8.1	7.6	16.6	<0.1	1.9	0.6
SCAQMD Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Note: SCAQMD Rule 403 Fugitive Dust applied. SCAQMD Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to **Appendix B** for Model Data Outputs.
Source: CalEEMod version 2022.1.1.14; see **Appendix B** for model outputs.

Operational Emissions

The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. CalEEMod was used to calculate the Project's area source, energy source, and mobile source, and mobile pollutant emissions. **Table 4.3-3: Operational Emissions (Maximum Pounds Per Day)** provides the CalEEMod estimated emissions from Project operations.

Area Source Emissions. Area-specific CalEEMod default inputs were used to calculate the Project's area source emissions. Area source emissions would be generated from gasoline-powered landscaping and maintenance equipment, and consumer products (such as household cleaners). Area source emissions would also be generated from consumer products, architectural coatings, and landscaping that were previously not present on the Project Site. Typically, area sources are small sources that contribute very little emissions individually, but when combined may generate substantial amounts of pollutants.

Energy Source Emissions. CalEEMod default inputs were used to calculate the Project's energy source emissions. Energy source emissions would be generated from the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for water heating and space heating and cooling, ventilation, lighting, appliances, and electronics.

Mobile Source and Mobile Emissions. The proposed Project's trip generation estimate based upon Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) trip generation rates. CalEEMod default inputs for vehicle mix, and trip distances were used to calculate the Project's mobile source emissions. Mobile source emissions are generated from motor vehicle use, 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, PM10, and PM2.5 are all pollutants of regional concern. NO_X and ROG react with sunlight to form ozone, known as photochemical smog. Additionally, wind currents readily transport PM10 and PM2.5. However, CO tends to be a localized pollutant that disperses rapidly at the source.

Table 4.3-3: Operational Emissions (Maximum Pounds Per Day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
Area	7.4	0.2	22.2	<0.1	<0.1	<0.1
Energy	<0.1	0.8	0.4	<0.1	0.1	0.1
Mobile	3.7	2.5	25.4	0.1	5.1	1.3
Total Emissions	***11.2***	***3.5***	***48.0***	***0.1***	***5.2***	***1.4***
South Coast AQMD Threshold	55	55	550	150	150	55
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Emissions were calculated using the California Emissions Estimator Model version 2022.1.1.14 (CalEEMod), as recommended by the South Coast AQMD. Worst-case seasonal maximum daily emissions are reported.
Source: CalEEMod version 2022.1.1.14; see **Appendix B** for model outputs.

Total Emissions. Based on the proposed land uses and operational characteristics, **Table 4.3-3** summarizes the CalEEMod estimated emissions from Project operations and indicates the Project's unmitigated area, energy, and mobile source emissions combined would not exceed SCAQMD thresholds for worst-case seasonal maximum daily emissions for any criteria air pollutants. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. The Project's operational air quality impacts would be less than significant.

Cumulative Short-Term Emissions

The South Coast Air Basin is designated nonattainment for O_3, PM10, and PM2.5 for State standards and nonattainment for ozone and PM2.5 for federal standards. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control

measures would also be imposed on construction projects throughout the South Coast Air Basin, which would include related cumulative projects. As concluded above, the Project's construction-related air quality impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the construction-related emissions. Therefore, construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the South Coast Air Basin's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As concluded above, the Project's operational-related air quality impacts would be less than significant. As a result, operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Therefore, Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant, and impacts would be less than significant.

4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Significance Analysis

The nearest sensitive receptors to the Project Site are multi-family residences located approximately 18 feet (approximately 5.49 meters) south of the Project Site. To assess potential impacts to nearby sensitive receptors, the SCAQMD established LSTs. 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]) to assist lead agencies in analyzing project-specific localized impacts.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. Based on the daily equipment modeled in CalEEMod, the maximum acres graded per day is 3.5. LSTs were established for NO_X, CO, PM10, and PM2.5, based on project size and local ambient air pollutant levels, as

determined by SRA. For this Project, the appropriate SRA for LSTs is the West San Gabriel Valley (SRA 8). Thus, the applicable LSTs for a 3.5 acre site in SRA 8 were used in this analysis.

SCAQMD's methodology indicates that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters or less from the project site. Therefore, the LSTs for 3.5 acre site with receptors at 25 meters were used for the construction analysis. **Table 4.3-4: Localized Significance of Construction Emissions (Maximum Pounds Per Day)** presents the results of localized emissions modeling for construction activity. Emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, construction impacts would be less than significant.

Table 4.3-4: Localized Significance of Construction Emissions (Maximum Pounds Per Day)

Construction Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Site Preparation 2024	36.0	32.9	6.7	4.1
Grading 2024	18.2	18.8	2.7	1.7
Foundations 2024	11.2	13.1	0.5	0.5
Building Construction 2024	11.2	13.1	0.5	0.5
Paving 2024	6.9	8.9	0.3	0.3
Building Construction 2025	10.4	13.0	0.4	0.4
Paving 2025	6.5	8.8	0.3	0.3
Paving 2026	6.2	8.8	0.3	0.2
Architectural Coating 2025	0.9	1.1	<0.1	<0.1
Architectural Coating 2026	0.9	1.1	<0.1	<0.1
Overlapping Phase: Foundations + Grading (2024)	29.5	31.9	3.2	2.1
Overlapping Phase: Building Construction + Paving (2024)	18.1	22.0	0.8	0.8
Overlapping Phase: Building Construction + Paving + Architectural Coating (2025)	17.8	23.0	0.7	0.7
Overlapping Phase: Paving + Architectural Coating (2026)	7.1	9.9	0.3	0.3
Maximum Daily Emissions	*36.0*	*32.9*	*6.7*	*4.1*
SCAQMD Localized Screening Threshold (3.5 acres of disturbance at 25 meters)	123	1,176	9	6
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2022.1.1.14; see **Appendix B** for model outputs.				

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, LSTs apply to on-site sources. LSTs for receptors located at 25 meters for SRA 8 were conservatively used in this analysis. The 2.0-acre LST threshold was used for the 2.9-acre Project Site. The operational emissions include all on-site Project-related stationary sources (i.e., area and energy sources). As shown on **Table 4.3-5: Localized Significance of Operational Emissions (Maximum Pounds Per Day)**, the maximum daily emissions during operations would not exceed applicable LSTs, and are not expected to result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, operational impacts would be less than significant.

Table 4.3-5: Localized Significance of Operational Emissions (Maximum Pounds Per Day)

Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
On-Site Emissions (Area and Energy Sources)	1.0	22.6	0.1	0.1
South Coast AQMD Localized Screening Threshold (2 acres at 25 meters)	98	812	2	1
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2022.1.1.14; see **Appendix B** for model outputs.				

The Project would not involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants (TACs), and no significant toxic airborne emissions would result from Project operations. Project construction activities are subject to regional, State, and federal regulations and laws concerning toxic air pollutants that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, Project impacts concerning the release of TACs would be less than significant.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th , Case No. S219783). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As previously discussed, project emissions would be less than significant and would not exceed SCAQMD thresholds. Localized effects of on-site project emissions on nearby receptors were also found to be less than significant. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable State or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. The AQMP is the most recent version that addresses CO concentrations. As part of the South Coast AQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with approximately 100,000 average daily traffic (ADT), was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm federal standard. The proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any Project area intersections from the Project's 1,227 ADT. Therefore, the Project would result in minimal emissions far below SCAQMD thresholds; impacts would be less than significant.

Construction-Related Diesel Particulate Matter

Construction of the proposed Project would generate diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

The California Office of Environmental Health Hazard Assessment (OEHHA) has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout a site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities would not expose sensitive receptors to substantial amounts of air toxins, and the Project would result in a less than significant impact.

4.3d Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, the Project's construction-related impacts concerning odors would be less than significant.

Operations

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as odor sources (i.e., agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding). The Project proposes development of office use, which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Project operations would not create objectionable odors. No impact would occur.

4.4 Biological Resources

The discussion below regarding potential impacts on biological resources is based in part on the Arborist Report (see **Appendix C: Rubio Wash Channel Improvements Project Arborist Report**) prepared by Dudek and the Arborist Addendum (see **Appendix D: Addendum Arborist Statement**) prepared by Craig Crotty Arbor Culture LLC.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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?				X
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?				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
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?				X

Impact Analysis

4.4a Would the Project 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 a vacant dirt lot with low-lying shrubs, weeds, and non-native grasslands scattered throughout the Project Site. No species that are identified as candidate, sensitive, or special-status species are known to exist in the local vicinity due to urbanized conditions. No impact occur in this regard.

4.4b Would the Project 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?

4.4c Would the Project 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. 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 in an urbanized area and was previously built out. According to Figure 8-1 of the General Plan, no riparian habitat or other sensitive natural communities are present in the Project Site or immediate vicinity. Additionally, the Project area is not included in local or regional plans, policies or regulations that identify riparian habitats or other sensitive natural communities. No impact occur in this regard.

4.4d Would the Project 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 With Mitigation Incorporated. The Project Site was previously developed and prior uses were demolished. The Project Site is 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) does not provide suitable nesting habitat for migratory birds.

According to the Arborist Addendum (**Appendix D**), there are five mature trees located on the Project Site adjacent to the Rubio Wash. Of these, a Chinese Elm located by Rubio Wash should be retained and protected; the other four will be removed due to encroachment and/or very poor condition. The Project would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), which would further protect migratory birds. Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any

migratory birds except as permitted by regulations issued by the United States Fish and Wildlife Service (USFWS). The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC Section 3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC Section 3503). Therefore, as the Project would require removal and encroachment into trees that could provide nesting habitat for migratory birds, impacts would potentially be significant.

To address potential impacts to migratory birds, the Project would be subject to compliance with **Mitigation Measure (MM) BIO-1**, which addresses construction activities during the nesting season. Therefore, following compliance with the relevant regulatory framework and **MM BIO-1**, the Project's potential impacts to nesting migratory birds would be reduced to less than significant.

Mitigation Measure

MM BIO-1 **Nesting Migratory Birds.** During construction, grubbing, brushing, or tree removal shall be conducted outside of the State identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside the nesting season, a Pre-Construction Nesting Bird Survey within and adjacent to the Project Site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.

4.4e Would the Project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant With Mitigation Incorporated. Landmark, historically significant, and mature trees located within Multiple Family, Commercial, and Industrial zones are protected under SGMC 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 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. Pursuant of SGMC Section 95.39, a permit must be issued by the City prior to tree removal. Street trees are protected under the SGMC 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.

As stated in the Arborist Report, there are 44 trees dispersed throughout the Project Site, of which 23 exhibit fair health, 8 exhibit good health, 12 exhibit poor health, and 1 is dead. Of the 44 trees, 8 are considered to be Landmark trees, 25 are considered to be Mature trees, and 11 have no tatus. Four of the species are considered weedy or invasive trees: Shamel ash, edible fig, tree of heaven, and Peruvian pepper. As further detailed in the Arborist Report, in total for protected trees, 16 would require removal, 9 of which are considered protect; 8 would require encroach into the tree protection zone, 6 of which are considered protected; 3 would experience indirect impacts and are considered protect; and 17 would be protected in place with no direct impacts. Therefore, because the Project would require removal and encroachment, impacts would be potentially significant. The Project would be required to implement **MM BIO-2** to reduce impacts to the 8 protected trees. With implementation of **MM BIO-2**, impacts would be reduced to less than significant.

Mitigation Measures

MM BIO-2 Prior to the issuance of a grading permit, the Applicant shall submit to the City a landscape plan or tree plan depicting replacement of the eight living trees proposed for removal. The eight living trees shall be mitigated at a minimum 2:1 ratio with 24-inch box size replacement trees. Replacement trees shall have an established maintenance period of two years.

4.4f Would the Project 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 Project is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan. No other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur in this regard.

4.5 Cultural Resources

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

Impact Analysis

4.5a Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The Project Site is located within an urbanized and mixed-use area of the City. The Project Site is vacant, with no structures on the Project Site or historic properties immediately adjacent to the Project Site. Therefore, the Project would not cause any adverse change to the significance of any historical resource, and no impact would occur.

4.5b Would the Project 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 Site vicinity and the disturbed nature of the Project Site, no cultural resources are expected to occur on-site. However, Project construction activities would involve approximately 26,637 CY of cut and potentially 4,842 CY of fill. Thus, Project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. Should Project excavation activities encounter native soils that could potentially support unknown buried archaeological resources, impacts would be potentially significant.

MM CUL-1 would require that the Applicant obtain a Qualified Archaeologist to oversee ground-disturbing and excavation activities, as well as conducting a Worker's Environmental Awareness Program to alert field personnel to the possibility of buried prehistoric or historic cultural deposits. **MM CUL-2** would require the Applicant to also retain a Native American tribal monitor from a consulting Tribe to monitor ground disturbance and excavation. Should Project excavation activities encounter previously archaeological resources, **MM CUL-3** would require all construction work to halt until the Qualified Archaeologist evaluates the find. **MM CUL-4** would require the appropriate Department of Parks and Recreation (DPR) 523 Site Forms be filed and submitted to

document any found resources. With implementation of **MM CUL-1** through **CUL-4**, impacts to archaeological resources would be reduced to less than significant.

Mitigation Measures

Please also refer to mitigation measures provided in **Section 4.18: Tribal Cultural Resources**.

MM CUL-1 Prior to the issuance of a grading permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist. The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, the Qualified Archaeologist shall prepare a Worker's Environmental Awareness Program (WEAP) and provide training to construction personnel to alert field personnel to the possibility of buried prehistoric or historic cultural deposits. The training shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

MM CUL-2 Prior to the issuance of a grading permit, the Applicant shall retain a Native American tribal monitor from a consulting Tribe. The Native American tribal monitor shall be selected based on ongoing consultation under Assembly Bill 52 prior to commence of any ground-disturbing activity. The Native American monitor shall be present during construction excavations such as grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall consider the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections or ceased entirely if determined appropriate by the consulting Tribe.

MM CUL-3 In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be

halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the Qualified Archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and the consulting Tribe.

If the resources are Native American in origin, the consulting Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines §15064.5(f) for historical resources and Public Resources Code §21083.2(b) for unique archaeological resources. The treatment plan shall be provided to the consulting Tribe for review. The treatment plan shall incorporate the consulting Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. In coordination with the consulting Tribe, any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

MM CUL-4 The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation (DPR) 523 Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures. The City shall also disseminate the report to consulting tribes that requested consultation under Assembly Bill 52.

4.5c Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. California Health and Safety Code (HSC) Sections 7050.5, 7051, and 7054 collectively address the illegality of interference with human burial remains, as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation and reburial procedures.

As discussed above, there is some potential for archaeological resources to be present on the Project Site. Similarly, there is a possibility that human remains could be interred underneath the Project Site. Should human remains be encountered during Project construction, HSC Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Pending direction from the Coroner and/or City, the Applicant shall be responsible for ensuring that the Native American Heritage Commission (NAHC) and the appropriate Native American representatives are contacted, and in turn that the NAHC contacts the most appropriate Most Likely Descendant (MLD). Treatment of the remains shall be conducted as directed by the Department of Community Development, pursuant to Coroner and MLD recommendations. Therefore, following compliance with all required regulations, the Project would not disturb any human remains, including those interred outside of dedicated cemeteries. Impacts would be less than significant.

4.6 Energy

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

Background: Building Energy Efficiency Standards

Building energy efficiency standards for new nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 and are updated every three years (CCR Title 24, Part 6). CCR Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible

incorporation of new energy efficiency technologies and methods. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards (2019 Standards), which went into effect on January 1, 2020. On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023 must comply with the 2022 Energy Code.

The 2019 Standards improved upon the previous 2016 Standards for new construction of and additions and alterations to nonresidential buildings. Under the 2019 Standards, nonresidential buildings are approximately 30 percent more energy efficient due mainly to lighting upgrades.

The CALGreen Code is a Statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen Code require new commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The CALGreen Code also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five topical areas.

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard (RPS) program[7] with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the CARB under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the CARB adopted its Renewable Electricity Standard regulations, which require all the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill (SB) 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026 and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under SB 100, the State cannot

[7] The Renewable Portfolio Standard is a flexible, market-driven policy to ensure that the public benefits of wind, solar, biomass, and geothermal energy continue to be realized as electricity markets become more competitive. The policy ensures that a minimum amount of renewable energy is included in the portfolio of electricity resources serving a state or country.

increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Impact Analysis

4.6a Would the Project 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.

Electricity

SCE provides electricity to the City. Total electricity demand in SCE's service area is forecast to increase by approximately 12,000 gigawatt hours (GWh)—or 12 billion kilowatt hours (kWh)—between 2015 and 2026.[8]

The Project's electricity demand is expected to be served by existing SCE electrical facilities. The Project's construction-related electrical demand is anticipated to be nominal because most construction equipment would be gas- or diesel-powered. Electricity consumption during Project construction is associated with he conveyance of water during ground disturbance activities. The Project is anticipated to consume approximately 5,496 kWh during construction, constituting approximately 0.00001 percent of Countywide consumption.

During Project operations, the estimated operational electrical demand is 1,857,145 kWh per year, which constitutes approximately 0.0028 percent of Countywide consumption and would represent a less than significant percent increase compared to the SCE service area's overall demand and existing consumption. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the most current Building Energy Efficiency Standards. Prior to Building Permit issuance, the City of San Gabriel Building Division would review and verify that the Project Site plans demonstrate compliance with the current Building Energy Efficiency Standards. The Project would also be required to comply with the CALGreen Code, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

SoCalGas provides natural gas service to the City. From 2019 to 2035, commercial demand in the SoCalGas service area is expected to decline from 101 billion cubic feet (bcf) to 81 bcf per year,[9] while supplies would decline from 1,995 bcf per year in 2020 to 1,585 bcf[10] per year in 2035.[11]

[8] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, 2018. Figure 49: Historical and Projected Baseline Consumption SCE Planning Area.

[9] California Gas and Electric Utilities, 2020 California Gas Report, 2000, pages 100-101.

[10] 1 million cubic feet (MMcf) per day is equivalent to approximately 0.37 bcf per year.

[11] California Gas and Electric Utilities, 2020 California Gas Report, pages 18-19.

No construction-related natural gas demand is anticipated since most construction equipment would be gas- or diesel-powered. Therefore, the Project would not require the use of natural gas during construction. The Project's operational natural gas demand is estimated to be 3,177,844 kBTU/year, constituting approximately 0.0011 percent of Countywide consumption. Project consumption is expected to be adequately served by existing SoCalGas facilities. Anticipated natural gas demand would represent a nominal percentage of overall demand in SoCalGas' service area. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Automotive Fuel

During Project construction, transportation energy use would depend on the type and number of trips, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Most construction equipment would be diesel-powered. Assuming that all construction equipment and haul/vendor trucks would be diesel-powered and all worker vehicles would be gasoline-powered, Project construction fuel consumption is estimated to be 101,396 gallons of diesel and 85,303 gallons of gasoline. This constitutes approximately 0.0196 percent and 0.0023 percent of Countywide diesel and gasoline consumption, respectively. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Project would not result in wasteful, inefficient, or unnecessary fuel consumption.

During Project operations, energy consumption would be associated with resident, employee, and customer trips, and periodic delivery truck trips. The Countywide annual gasoline fuel use in 2022 was 3,774.8 million gallons and the Countywide annual diesel fuel use in 2022 was 516.2 million gallons.[12] The estimated operational gasoline and diesel fuel demand is 112,977 gallons and 11,120 gallons, respectively. This constitutes approximately 0.003 percent and 0.002 percent of countywide gasoline and diesel consumption, respectively, and would represent a less than significant percent increase compared to the County's overall consumption. The Project proposes a mixed use development in close proximately to the Interstate 210 (I-210) and I-10, reducing the need to travel long distances to a major highway and services. Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption.

The Project would be subject to compliance with applicable energy standards and new capacity would not be required. Proposed construction and operations would not result in wasteful,

[12] California Air Resources Board, EMFAC2021.

inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in a less than significant environmental impact concerning consumption of energy resources.

4.6b Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen Code standards. As concluded in **Threshold 4.6a**, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

SCAG's 2020–2045 RTP/SCS establishes emissions goals for automobiles and light-duty trucks to achieve the per-capita greenhouse gas (GHG) emission reduction target of 19 percent by 2035, consistent with both the AB 32 target date and Executive Orders 5-03-05 and B-30-15 GHG reduction goals. CARB reviewed and approved this conclusion in October 2020 by their Executive Order G-20-239, specifying that SCAG's adopted RTP/SCS would, when implemented, achieve the applicable GHG emissions reduction target for automobiles and light trucks by 2035, relative to 2005 levels, as established for the region.[13] The Project is consistent with regional strategies to reduce passenger VMT (and thereby reduce transportation energy consumption) by providing community-serving uses in proximity to residences. The Project would be consistent with regional goals to reduce trips and VMT by locating office uses adjacent to other uses, which reduces vehicle trip lengths. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

4.7 Geology and Soils

The discussion below regarding potential impacts on geology and soils is based in part on the Geotechnical Report (see **Appendix E: Geotechnical Engineering Investigation**) prepared for the Project Site by Geotechnologies, Inc.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the				X

[13] SCAG, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Amendment #1, 2021, https://scag.ca.gov/sites/main/files/file-attachments/final-amendment-01-connect-socal-110421.pdf?1636060850. Accessed July 15, 2023.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Impact Analysis

4.7a(i) Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the 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. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back

from the fault (typically 50 feet). No Holocene-active faults are known to cross the Project Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest Holocene-active faults are the Raymond Fault, located 3.4 miles north of the Project Site and the Verdugo Fault, located 4.8 miles northwest of the Project Site. Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault, and there would be no impact.

4.7a(ii) Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. As previously mentioned, there are no identified Alquist-Priolo Earthquake Fault Zones within the City. However, there are several known faults near the Project Site. The closest Holocene-active faults are the Raymond Fault, located 3.4 miles north of the Project Site, and the Verdugo Fault, located 4.8 miles northwest of the Project Site. City's location in Southern California is characterized by high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults.

The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Therefore, Project could expose people and structures to potential adverse effects involving strong seismic ground shaking. The intensity of ground shaking on a site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the site and epicenter. Regulatory controls to address potential seismic hazards would be imposed on the Project through the permitting process. The Project would be required to be compliance with the California Building Standards Commission's (CBSC) most recent California Building Code (CBC), including regulations and recommendations that address seismic resistance. CBSC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the CBC, which specifies design requirements to minimize the effects of potential earthquake hazards. Following compliance with standard engineering practices, the established regulatory framework, potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant.

4.7a(iii)Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. The historic high groundwater level for the Project Site was greater than 100 feet below the ground surface (bgs). Additionally, according to Chapter 5 of the general

Plan and the California Geologic Survey (CGS) seismic hazard mapping, the Project Site is not within an area with potential for liquefaction. Therefore, the Project Site would not be at risk of liquefaction, and there would be no impact.

4.7a(iv)Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The Project Site is currently undeveloped and relatively flat, therefore, hazards associated with landslides would be considered low. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides, and there would be no impact.

4.7b Would the Project result in substantial soil erosion or the loss of topsoil?

Less Than Significant. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is undeveloped and is covered in non-native grassland. During the Project's construction phase, activities such as grading and site preparation, including excavation of soils to accommodate the proposed parking garage and removal of existing impervious surfaces during demolition and construction could leave soils at the Project Site susceptible to soil erosion.

Due to the depth of the excavation necessary to develop the proposed structures and the on-site soil characteristics, the use of shoring within deep excavations would be required to ensure that areas adjacent to the Project Site and the Rubio Wash do not become compromised during construction. Specific recommendations within the Geotechnical Report and a design-level Geotechnical Report should be adhered to during construction activities to reduce impacts associated with soil erosion and soil instability during excavation. In addition, to shoring, other means of stabilization such as soldier piles, lagging, and anchoring may be used to reduce soil instability within deep excavations as indicated in the Geotechnical Report. It is also recommended that all drainage is directed away from the top of excavations and/ or water is not allowed to pond atop any open excavations.

The Project would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind- and waterborne erosion at the Project Site, as well as to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. Additionally, the applicant would be required to comply with SGMC Chapter 98.02, which provides erosion control measures in conjunction with regulations set forth in NPDES permit. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling

and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.

During Project operation, the Project would be required to comply with the County's Low Impact Development (LID) Standards Manual for stormwater quality control measures, particularly as it relates to sedimentation. Additionally, SGMC Section 53.07 requires projects to implement BMPs prescribed by the Los Angeles Regional Water Quality Control Board (LARWQCB) to enhance and protect the water quality of receiving waters.

With compliance with the design recommendations from the Geotechnical Report and the applicable regulations above, impacts would be less than significant.

4.7c Would the Project 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?

4.7d Would the Project 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. See **Threshold 4.7a(iv)** and **4.7a(iii)** regarding landslides and liquefaction, respectively. As stated therein, the Project would result in no impacts related to landslides and liquefaction.

Impacts associated with lateral spreading are not expected due to the lack of liquefiable soils within the Project Site and the expected depth to groundwater. Therefore, impacts associated with lateral spreading are not expected.

Impacts associated with subsidence and/or collapse typically occur when underlying soils cannot withstand pressures exerted by overlying soils and/ or structures. According to the Geotechnical Report, soils on-site are classified as medium dense to dense. Laboratory tests indicate that the on-site soils would exhibit foundation settlement on the order of 0.75-inch, which would most likely occur below the heaviest loaded columns within the structure. In addition, differential settlement is not expected to exceed 0.25-inch. Based on the dense nature of the onsite soils, impacts associated with subsidence, collapse, and expansive soils are expected to be less than significant. Regardless, the Project would be required to comply with design recommendations from the Geotechnical Report, standard engineering and execution of earthwork, and applicable regulations (e.g., CBC, City grading codes, etc.). Impacts would be less than significant.

4.7e Would the Project 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. The Project's wastewater would discharge to the local City sewer line for conveyance to a SGCMWD trunk sewer. The Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

4.7f Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. There are no known unique geologic features within the Project Site. Artificial (man-made) fill and alluvium comprise the surficial soils on the Project Site. While there are no documented paleontological resource on the Project Site, Project excavation would result in potential impacts on undiscovered buried paleontological resources. Impacts would be potentially significant.

The Project would be required to implement **MM GEO-1** to reduce construction-related paleontological resources impacts associated with the Project. With implementation of **MM GEO-1**, impacts would be reduced to less than significant.

Mitigation Measures

MM GEO-1 Prior to issuance of grading permit, the Applicant shall retain a qualified paleontologist who meets the Society of Vertebrate Paleontology (SVP) guidelines to oversee a paleontological monitor who shall be present during grading activities within sensitive older alluvial material and the Topanga Bedrock Formation. The monitor does not have to be present if recent alluvial material or volcanic material is being encountered. The paleontological monitor shall be approved by the City and retained and paid for by the Applicant. The paleontological monitor will also be able to halt construction within a 50-foot radius of a fossil discovery until the fossil can either be removed off site or the City is notified of the need to further assess the discovery. If the find is large enough to warrant further evaluation and/or extraction, then the following fossil "discovery" protocol shall be followed:

a) The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

b) The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.

c) Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

Prior to the issuance of any building permit, the Applicant shall submit a letter to the City for the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

4.8 Greenhouse Gas Emissions

A Greenhouse Gas (GHG) analysis was prepared for the proposed Project by Kimley-Horn and Associates, Inc. The GHG modeling outputs and results are included in **Appendix F: Greenhouse Gas Impact Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Impact Analysis

4.8a Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The proposed Project would include direct and indirect GHG emissions from construction and operations. Construction is considered a direct source since these emissions occur at the Project Site. Direct operational-related GHG emissions from the proposed Project would include emissions from area and mobile sources, while indirect emissions are from energy consumption, water demand, and solid waste.

Short-Term Construction Greenhouse Gas Emissions

Project construction would result in direct emissions of carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) from construction equipment, the transport of materials, and construction worker travel to and from the Project Site. Once construction is complete, the generation of construction-related GHG emissions would cease. 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.[14]

Total GHG emissions generated during all phases of construction for the Project were combined and are presented in **Table 4.8-1: Construction-Related Greenhouse Gas Emissions.** The CalEEMod outputs are contained within **Appendix F.** As shown in **Table 4.8-2**, the Project total construction would result in 1,624 metric tons of CO_2 equivalent ($MTCO_2e$) (approximately 54 $MTCO_2e$ per year when amortized over 30 years).

[14] The project lifetime is based on the standard 30-year assumption of the SCAQMD (SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Table 4.8-1: Construction-Related Greenhouse Gas Emissions

Construction Year	$MTCO_2e$
Year 1 Construction Emissions (2024)	957
Year 2 Construction Emissions (2025)	639
Year 3 Construction Emissions (2026)	28
Total Construction Emissions	**1,624**
30-Year Amortized Construction	54
Source: CalEEMod version 2022.1.1.14; see **Appendix F** for model outputs.	

Long-Term Operational Greenhouse Gas Emissions

Operational (long-term emissions) would occur over the Project's life. The Project would result from direct emissions such as vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water and wastewater, and emissions associated with solid waste, and any fugitive refrigerants from air conditioning or refrigerators. **Table 4.8-2**: **Project Greenhouse Gas Emissions** provides the Project's total operational GHG emissions and indicates they would total approximately 1,696 $MTCO_2e$ annually from both Project construction and operations.

Table 4.8-2: Project Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year
Construction Amortized over 30 Years	54
Area Source	8
Energy	601
Mobile	924
Waste	32
Water & Wastewater	75
Refrigerants	2
Total Emissions[1]	**1,696**
South Coast AQMD Project Threshold	3,000
Exceeds Threshold	**No**
Notes: 1. Totals may be slightly off due to rounding. Source: CalEEMod version 2022.1.1.14. Refer to **Appendix F** for model data outputs.	

Table 4.8-2 indicates that the proposed Project would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year.[15] Approximately 90 percent of the Project's emissions are

[15] On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 $MTCO_2e$ annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant.

from energy and mobile sources which would be further reduced by implementation of Statewide programs and measures, including the reduction in the carbon content of fuels, CARB's advanced clean car program, CARB's mobile source strategy, fuel efficiency standards, cleaner technology, and fleet turnover. Additionally, SCAG's 2020-2045 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035.[16] Accordingly, the Project would not interfere with the State's efforts to reduce GHG emissions in 2030.

Project operations would benefit from the implementation of current and potential future energy regulations including the SB 100 renewable electricity portfolio target of 60 percent renewable energy by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Further, the proposed Project would be subject to compliance with all building codes in effect at the time of construction which include energy conservation measures mandated by Title 24 of the CBSC – Energy Efficiency Standards. Title 24 is part of the State's plans and regulations for reducing emissions of GHGs to meet and exceed AB 32 and SB 32 energy reduction goals. Because Title 24 standards require energy conservation features in new construction, they help reduce GHG emissions. Therefore, the Project would have a less than significant impact on GHG emissions.

4.8b Would the Project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

City of San Gabriel Energy Action Plan

The City's Energy Action Plan (EAP) establishes energy efficiency targets to reduce GHG emissions related to natural gas consumption. The EAP identifies the goal to support the new construction of new buildings that will have no net impact on community-wide energy demand by 2020. The EAP identifies the action to support net zero energy consumption through the use of innovative alternative building materials and designs that improve building energy efficiency. In addition, the EAP identifies the need to encourage the model San Gabriel Valley Voluntary energy efficiency guidelines to help applicants identify cost-effective policies for their projects and encourage new nonresidential projects to participate in SCE's Savings by Design for new development to exceed minimum energy efficiency standards.

The Project would be required to comply with the City's EAP goals and proposed new buildings would be designed with alternative building materials to improve energy efficiency. Therefore, the Project would be consistent and not conflict with the EAP.

The EAP identifies the need to promote a rebate program for refrigeration units, home kitchen appliances, washer and dryers, and other home equipment programs, including rebates from the CEC and the SCAQMD. The City would also provide energy educational information through the

[16] CARB, SB 375 Regional Plan Climate Targets, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. Accessed July 15, 2023.

City's website and distribution of Energy Leader Partnership (ELP) materials and encourage in-home monitoring programs provided by SCE. The City would also improve the insulation, roofing, and other aspects of structure design to maximize energy efficiency; upgrade, replace, and relocate HVAC units for optimal energy efficiency and in partnership with SCE and Energy Wise Partnership (EWP); and pursue installation of electricity service meters at HVAC units to allow for tracking and monitoring. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

California Air Resource Board Scoping Plan Consistency

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission (ZE) transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include:

- Implementing SB 100 (achieve 100 percent clean electricity by 2045)
- Achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II
- Implementing the Advanced Clean Fleets regulation to deploy zero-emission vehicle (ZEV) buses and trucks

Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further

reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential developments. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand.

Scoping Plan Appendix D, Local Actions. Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. 2022 Scoping Plan Appendix D includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects.[17] CARB specifically states that Appendix D does not address other land uses (e.g., industrial).[18] However, CARB plans to explore new approaches for other land use types in the future.[19]

The 2022 Scoping Plan Appendix D lists potential actions that support the State's climate goals. However, the Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features, mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency.

The Project would be consistent with GHG reduction measures. For example, the Scoping Plan's construction measures include enforcing idling time restrictions on construction vehicles, requiring construction vehicles to operate highest tier engines commercially available, diverting and recycling construction waste, minimizing tree removal, and increased use of electric and renewable fuel powered construction equipment and required renewable diesel fuel where commercially available.

Appendix D notes that residential and mixed-use projects that meet the following three priority areas are "clearly" consistent with the State's goals and projects that have these key project attributes should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals. Appendix D also notes that lead agencies may determine, with adequate

[17] CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, November 2022, page 21.

[18] CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 4.

[19] CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 21.

additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals.[20]

- Transportation Electrification. Table 3 in the 2022 Scoping Plan Appendix D notes that to be clearly consistent with the State's goals, projects should provide EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the CALGreen Code. The Project is consistent with this attribute as the Project would comply with SGMC requirements.

- VMT Reduction. The Scoping Plan notes that to be consistent with the VMT reduction attribute, projects should be located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer); do not result in the loss or conversion of natural and working lands; and consist of transit-supportive densities (minimum of 20 residential dwelling units per acre). The proposed Project is an infill project surrounded by existing urban uses, does not result in the loss of natural and working lands (i.e., it would redevelop an existing shopping center), and has a density of 77.6 dwelling units per acre.

California's transition away from fossil fuel–based energy sources will bring the Project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The Project would be subject to the local and regional regulatory framework, including the California Building Energy Efficiency Standards and the CALGreen Code. As such, the Project would not conflict with the broader goals listed in the 2022 Scoping Plan. Impacts would be less than significant.

SCAG Regional Transportation Plan/Sustainable Communities Strategy Consistency

Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt and then update a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that its region will meet a target, set by CARB, for reducing GHG emissions. The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

[20] CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 23.

Reflecting that purpose, the primary goal of SCAG's 2020–2045 RTP/SCS is to provide a framework for achieving the CARB-assigned per capita reduction targets for GHG emissions from cars and light-duty trucks through land use planning and transportation options, while accounting for anticipated future growth within the region. To accomplish this target, the 2020–2045 RTP/SCS identifies various strategies for reducing per capita VMT. New GHG reduction targets are assigned by CARB, and thus, SCAG's long-range planning document is updated, every four years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in communities with a variety of transportation and housing choices, while reducing automobile use and, thus, GHG emissions from that use.

With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[21] These strategies and policies are addressed below. Also, the Project's consistency with applicable growth forecasts is also assessed because the development of the RTP/SCS involved compilation of local land use and growth trends to form the basis for projections and strategies of the RTP/SCS.[22] Key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns, include: (1) new housing and job growth focused in High Quality Transit Areas (HQTAs); (2) limit total acreage of greenfield or otherwise rural land uses converted to urban use; and (3) reduce VMT per capita.

Consistency with Integrated Growth Forecast. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies of local jurisdictions within SCAG's jurisdiction applicable to the specific area. The Project would be consistent with the General Plan land use designation of General Commercial and therefore would be consistent with, and not conflict with, local and regional employment projections.

Consistency with VMT Reduction Strategies and Policies. According to the Traffic Impact Study prepared by Kimley-Horn in February 2023, VMT was analyzed using the City of San Gabriel VMT Baselines and Thresholds of Significance for Transportation Impacts (July 2020). As shown in the Traffic Impact Study, local serving-retail uses less than 50,000 SF are assumed to have less than a significant impact. The Project would contain 13,378 SF of retail and restaurant space; therefore, it is not anticipated to lead to longer local trips, thus reducing or maintaining regional VMT.

[21] SCAG, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, page 3.8-61.

[22] SCAG, 2020-2045 RTP/SCS (Connect SoCal), page 10.

Therefore, the Project would result in significant GHG emissions, which render the Project consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative. Another goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. Of the 438 vehicle parking spaces, 45 parking spaces would be designated for EV and 8 spaces would be designated for clean air, vanpool, and EV. As such, the Project would exceed CALGreen Code requirements. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Energy Efficiency Strategies and Policies. Another important goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. That goal is to actively encourage and create incentives for energy efficiency, where possible. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by CALGreen Code.[23] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize any impact on natural resources and infrastructure. Landscape design would comply with the requirements of the water efficiency landscape ordinance and landscape regulations of the City. In addition, the Project would be subject to the 2022 Title 24 standards, which encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Land Use Assumptions. At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions from car and light-duty truck travel through better land use planning.[24] Generally, projects are considered consistent with the provisions and general policies of local and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.[25]

The Project would support, and not conflict with, the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by reducing GHG emissions from cars and light-duty trucks through its land use characteristics incorporated into the Project. The Project would develop its increased density, and therefore its job growth, on a previously undeveloped urban infill site in close

[23] California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

[24] As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled.

[25] See, e.g., *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719.

proximity to mass transit options. These Project land use characteristics would focus its job growth in an urban environment, not in a greenfield or rural area, and would minimize the Project's vehicle miles traveled. In addition, the Project would provide bicycle parking spaces and storage that would serve to promote walking and use of bicycles over travel by car or truck. As such, the Project's location and design would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[26] By furthering implementation of SB 375, the Project supports regional land use and transportation-related GHG reductions consistent with State regulatory requirements.

The reduction strategies stated in the 2020–2045 RTP/SCS are "consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level."[27] The strategies identify how the SCAG region can achieve GHG reductions and while SCAG does not have a direct role in the implementation of these strategies, SCAG works to support local jurisdictions by identifying ways to implement the RTP/SCS that fits the vision and needs of each local community.[28]

The Project would support, and not conflict with, the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by reducing per capita GHG emissions from cars and light-duty trucks through its land use characteristics and through the VMT-reducing Project Design Features incorporated into the Project. The Project would develop its increased density, and therefore its job growth, on a previously undeveloped urban infill site in close proximity to mass transit options. These Project land use characteristics would focus its job growth in an urban environment, not in a greenfield or rural area, and would minimize the Project's vehicle miles traveled. In addition, the Project would provide bicycle parking spaces and storage that would serve to promote walking and use of bicycles over travel by car or truck. As such, the Project's location and design would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[29] By furthering implementation of SB 375, the Project supports regional land use and transportation-related GHG reductions consistent with State regulatory requirements.

[26] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

[27] SCAG, 2020–2045 RTP/SCS Connect SoCal, page 48.

[28] SCAG, 2020–2045 RTP/SCS Connect SoCal, page 49.

[29] As discussed in **Appendix F**, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

4.9 Hazards and Hazardous Materials

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Impact Analysis

4.9a Would the Project 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 of hazardous waste 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.

Project construction would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. The use of these materials during Project construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment and applying paints and other coatings. Project construction would be temporary, and existing regulations of several agencies would govern these activities. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or environment. The primary regulatory requirements include SCAQMD Rule 1166 (volatile organic compound emissions) and Rule 1466 (fugitive dust TACs).

The Project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. However, the proposed Project could involve the use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. All potentially hazardous waste generated by medical offices would be required to be disposed of according to the Occupational Safety and Health Administration (OSHA) requirements. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment. The hazardous materials used during operations would be stored, handled, and disposed of in accordance with applicable regulations. Therefore, following compliance with the regulatory requirements, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

4.9b Would the Project 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.

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 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 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.

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.

4.9c Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project is not within one-quarter mile of an existing school. The closest school is Del Mar High School, located at 312 South Del Mar Avenue, approximately 0.7 miles southwest of the Project Site. Additionally, the Project would not involve the handling of, nor would it emit hazardous materials. Therefore, the proposed Project would have no impact.

4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic Substances Control (DTSC). The Project Site is not identified on a compiled hazardous materials site list pursuant to California Government Code Section 65962.5. Additionally, there are no recognized Cortese List sites in the City. the Project Site is not listed on the federal, State, or local regulatory agency databases.[30,31] Therefore, no impact would occur.

4.9e 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 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 3.5 miles to the southeast. Therefore, Project implementation would not introduce a safety hazard for people residing or working in the Project area. No impact would occur related to airport-related safety hazard or excessive noise.

[30] Department of Toxic Substance Control, Hazardous Waste and Substances Site List, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=201+S+San+Gabriel+Blvd. Accessed July 17, 2023.

[31] State Water Resources Control Board, GeoTracker, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=201+S+San+Gabriel+Blvd. Accessed July 17, 2023.

4.9f Would the Project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the General Plan, the City's Multi-Hazard Functional Plan establishes tactics to address local and regional hazards. Since 1898, 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 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. Therefore, the Project would not conflict with the City's adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

4.9g Would the Project 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 State of California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Map, the Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for both a Local Responsibility Area (LRA) and State Responsibility Area (SRA).[32] The Project Site is in an urbanized area, and no areas of wildland are present in the Project vicinity. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires, and there would be no impact.

4.10 Hydrology and Water Quality

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
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				

[32] California Department of Forestry and Fire Protection, Fire Hazard Severity Zone Rollout Application, https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2. Accessed July 19, 2023.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Impact Analysis

4.10a Would the Project violate water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact.

Water Quality Standards/Waste Discharge Requirements - Short-Term Construction

The Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the NPDES Program's Construction General Permit. Construction activity subject to the Construction General Permit includes any construction or demolition activity including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than one acre. The Project would disturb approximately 2.9 gross acres and would be subject to the Construction General Permit. SGMC Chapter 53: Storm Water and Urban Runoff Pollution Prevention, specifies development requirements to reduce pollutants in stormwater and urban runoff to the maximum extent practicable. SGMC Section 53.12 (A): Low impact development requirements for new development and redevelopment, requires new development projects, like the proposed Project, to comply with the current Municipal Separate Storm Sewer System (MS4) permit (Order No.530-C.S.) to less the water quality

impacts of development by using smart growth practices, and integrate LID requirements for stormwater pollution maintenance.

In addition to compliance with NPDES and SGMC, any future development disturbing one acre or greater is required to obtain coverage under the Construction General Permit. To obtain coverage under the Construction General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents, which include a Notice of Intent (NOI) and other compliance-related documents. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. The types of required BMPs would be based on the amount of soil disturbed, the types of pollutants used or stored at the Project Site, and proximity to water bodies. Following compliance with NPDES and SGMC Chapter 5 requirements, which would be monitored by the City's Public Works/Engineering Department, construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant.

Water Quality Standards/Waste Discharge Requirements - Long-Term Operations

The Los Angeles County Flood Control District (LACFCD), the County of Los Angeles, and the City of San Gabriel, along with 85 other incorporated cities within the County (Permittees) discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175[33] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[34] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes San Gabriel. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to the County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project would add more than 10,000 SF of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. The Project would be

[33] California State Water Quality Control Board, Order No. R4-2012-0175 NPDES Permit No. CAS004001.
[34] California State Water Quality Control Board, Order No. R4-2012-0175 NPDES Permit No. CAS004001.

required to implement post-construction runoff pollution reduction BMPs compliance with a Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses.

As part of these requirements, the proposed Project would prepare a SUSMP which would outline the stormwater treatment measures or post-construction BMPs required to control pollutants of concern, such as the following standard source control and treatment control SUSMP BMPs:

- Peak Stormwater Runoff Discharge Rate: Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.
- Provide storm drain system stenciling and signage to discourage illegal dumping.
- Design material storage areas within enclosures or secondary containment structures (e.g., berms, dikes, curbs, etc.) to prevent leaks or spills of pollutants from entering the storm drain system.
- Properly design trash storage areas to prevent off-site transportation of trash.
- Provide evidence of ongoing BMP maintenance of any structural BMPs installed.
- Provide planter boxes for structural or treatment control BMPs.
- Design post-construction structural or treatment control BMPs to treat stormwater runoff. Stormwater treatment facilities and systems would be designed to meet the following requirements:
- Volumetric Treatment Control BMPs would be designed to capture the volume of runoff from a 0.75-inch storm event or an 85th percentile storm, whichever is greater, prior to discharging to the public storm drain system.
- Flow based Treatment Control BMPs would be designed to the same standards as the volume-based control BMPs. The flow of runoff produced from the storm event shall be equal to or at least 0.2 inch per hour.
- Treatment devices shall be sized and designed to meet the above requirements.

As recommended by the County of Los Angeles LID Standards Manual, the selection of LID BMPs proposed from the proposed Project must follow the following order of preference: infiltration, capture and reuse, biofiltration, and other treatment BMPs at the discretion of the Director of Public Works that demonstrate compliance with LID design requirements to the maximum extent practicable. Following compliance with NPDES requirements (i.e., Los Angeles County's LID Ordinance and SGMC), which include LID BMPs, operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant.

4.10b Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project Site is currently vacant. Dewatering would not be required during Project construction as the historic groundwater levels are deeper than the maximum depth of excavation anticipated for the Project's subterranean garage. Project construction would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project impedes sustainable management of the Main San Gabriel Valley Basin. Therefore, impacts would be less than significant.

The Project would increase imperviousness at the Project Site. A majority of the stormwater that enters the Project Site flows into the local stormwater system. The Project Site currently has a limited groundwater recharge potential because relatively low levels of stormwater percolates into the soil due to prevalence of impervious surfaces in the surrounding area. The proposed Project does not propose groundwater withdrawal or permanent dewatering. While the Project would be served by the SGCWD, which relies primarily on groundwater drawn from the Main Basin and the Raymond Basin, the SGCWD has indicated in its Urban Water Management Plan (UWMP) that it has adequate resources to meet the water demands for the City. Therefore, no lowering of the groundwater table would occur, and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project impedes sustainable management of the Main San Gabriel Valley Basin. Therefore, impacts would be less than significant.

4.10c Would the Project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would:

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

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

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

(iv) Impede or redirect flood flows?

Less Than Significant Impact. There are no streams or rivers on the Project Site, and the Rubio Wash is a concrete-lined subgrate tributary of the Rio Hondo. While the Project would increase impervious surfaces, the existing soil characteristics do not permit groundwater infiltration to the groundwater table. Implementation of the Project would improve stormwater runoff quality through LID BMPs and would maintain similar drainage patterns to reach the existing storm drains. Therefore, impacts to erosion, runoff, drainage systems, and flows would be less than significant.

4.10d Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

No Impact. The Project Site is mapped by the Federal Emergency Management Agency (FEMA) as lying within a Zone X area, which is an "Area of Minimal Flood Hazard" and is not located within a Special Flood Hazard Area. The Project is also not located within a potential inundation area.[35] The Project is not located in proximity to an open body of water such that a tsunami or seiche could occur. Therefore, no impact would occur.

4.10e Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project would comply with applicable water quality regulations for short-term and long-term impacts (see **Threshold 4.10a**). The Project falls under the jurisdiction of the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the Rio Hondo/San Gabriel River Watershed EWMP; and the RWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB; and the County of Los Angeles and the City of San Gabriel is a Co-Permittee under the Los Angeles County NPDES MS4 Permit, and as such is required to implement development planning guidance and control measures regarding water quality impacts from new development. The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of the Stormwater Quality Management Program; and includes a LID Plan that designates BMPs that must be used by projects to address water infiltration, filtering, treatment and peak-flow discharge

The Project would improve stormwater runoff quality through implementation of LID BMPs. The Project's groundwater impacts are discussed under **Threshold 4.10b** above. As indicated, the proposed Project would have a less than significant impact.

The proposed Project would thereby implement the necessary BMPs to support the applicable plans; and the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

[35] California Department of Water Resources, California Dam Breach Inundation Maps, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed July 20, 2023.

4.11 Land Use and Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?			X	

Impact Analysis

4.11a Would the Project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project is an infill development, and the Project Site is fenced off on all sides. The Project would allow for connectivity with the nearby multi-family residential developments and commercial uses. Therefore, the proposed Project would not physically divide the existing residential community nor change the connectivity between the surrounding residential and commercial uses. There would be no impact.

4.11b Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The Project Site's General Plan land use designation is General Commercial and is zoned Mixed-Use PD. The Mixed-Use PD land use designation is intended to allow a range of uses that are permitted in any residential, commercial, or mixed-use zone. **Table 4.11-1: General Plan Consistency** describes Project consistency with applicable policies of the City's General Plan.

Table 4.11-1: General Plan Consistency

Goal	Consistency
Goal LU-1.5. Support new development that efficiently and effectively combines residential and commercial uses.	**Consistent.** Project implementation would develop 225 residential units and approximately 13,449 SF of ground-floor commercial uses. The proposed mixed-use development would be street-facing and would be surrounded by other residential and commercial uses on all sides. The Project's components would serve both new residents and the larger surrounding community. As such, Project implementation would support new development that efficiently and effectively combines residential and commercial uses.

Goal	Consistency
Goal LU-1.6. Ensure that new development is appropriately and sensitively buffered from its neighbors.	**Consistent.** Surrounding land uses include multi-family residential to the west; commercial uses to the north and east; and residential and commercial to the south. The Project is designed to include ground-level, street facing commercial uses adjacent to other existing commercial uses to the north, east, and south of the Project Site. The Project would also integrate both residential and commercial uses to serve as a connection to the surrounding land uses. The Project would also include various forms of open space and landscaping to provide a buffer between the Project and the surrounding neighbors.
Goal LU-1.9. Use redevelopment judiciously to promote economic growth, eliminate blight, and build affordable housing.	**Consistent.** The Project Site is currently vacant and underutilized. The proposed infill, mixed-use development would revitalize the visual character and quality of the Project area through redevelopment. Project implementation would contribute to the maintenance and expansion of the City's economic base as the proposed Project 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 in a manner that would promote economic growth and eliminate blight.
Goal LU-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 Goal LU-1.6.
Goal LU-1.13. Think and act creatively to maximize and increase public open space and greenery in our community.	**Consistent.** The Project would maintain the street trees existing on its frontages and increase the landscaping on the Project Site. The Project would also include a Public Art Program.
Goal ED-1.4. Create a vibrant business community.	**Consistent.** The Project's mixed-use development would revitalize the currently vacant site and surrounding commercial area, activate the pedestrian street front, and increase connectivity between the Project Site and its neighbors.
Goal ED-4.3. Develop retail that will address the needs of the community.	**Consistent.** The Project's commercial uses would include multiple restaurants and retail spaces. These uses would provide services to the surrounding area and to the residents on the Project Site.
Goal ER-8.1. Create a verdant City by maintaining significant trees, requiring developers to plant additional trees, and promoting the healthy	**Consistent.** While the Project would remove some trees from the Project Site, the Project would ultimately replace those trees (see **MM BIO-2**) and increase the amount of

Goal	Consistency
maintenance of trees.	open space and landscaping on the Project Site.
Goal CD-10.13. Require development to provide architectural and public art amenities.	**Consistent.** See Goal LU-1.13.

The Project would be consistent with all applicable goals, policies and regulations regarding land use. Therefore, impacts would be less than significant.

4.12 Mineral Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
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?				X

Impact Analysis

4.12a Would the Project 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?

4.12b Would the Project 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. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential.[36] No known mineral resources and locally important mineral resource recovery sites are located within the City.[37] Additionally, the Project Site is in an area designated as MRZ-1, which indicates that there is enough information to determine that no significant mineral deposits are present in the area. Therefore, the proposed Project would have no impact regarding mineral resources.

[36] California Department of Conservation, Statutes and Regulations, 2020, https://www.conservation.ca.gov/index/Documents/DMR-SR-1%20Web%20Copy.pdf. Accessed July 20, 2023.

[37] California Department of Conservation, CGS Information Warehouse: Mineral Land Classification, 2015. https://maps.conservation.ca.gov/cgs/informationwarehouse/. Accessed July 20, 2023.

4.13 Noise

The discussion below regarding noise is based in part on the Noise and Vibration Study (see **Appendix G: Noise and Vibration Analysis**) prepared for the Project Site by Kimley-Horn.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate 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?			X	
b) Generate of excessive ground borne vibration or groundborne noise levels?			X	
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?				X

Noise Background

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of various distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise as well as the time of day when the noise occurs. For example, the equivalent continuous sound level (L_{eq}) is

the average acoustic energy content of noise for a stated period of time; thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. The Day-Night Sound Level (L_{dn}) is a 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the nighttime. The Community Noise Equivalent Level (CNEL) is a 24-hour average L_{eq} with a 10-dBA weighting added to noise during the hours of 10:00 P.M. to 7:00 A.M. and an additional 5 dBA weighting during the hours of 7:00 P.M. to 10:00 P.M. to account for noise sensitivity in the evening and nighttime.

Existing Setting

The Project Site is impacted by various noise sources. Mobile noise sources are primarily from traffic along East Live Oak Street to the north, San Gabriel Boulevard to east, and South Pine Street to west. The primary sources of stationary noise near the Project Site include residential noise from the nearby multi-family housing, e at the nearby medical office buildings, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.). The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

Noise Measurements

Transportation systems are a primary source of urban noise. Management of noise from the most significant of these sources (aircraft, trains and freeways) is generally preempted by federal and State authority. The primary local authority is municipal regulation of land use (i.e., land use planning) and establishment and enforcement of noise ordinances. Management of noise emanating from freeways is generally within the authority of federal and state jurisdictions, namely, the Federal Highway Administration (FHWA) and Caltrans.

The Project Site is currently undeveloped and is fenced off on all sides. To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted four short-term noise measurements on June 7, 2023. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project Site. The 15-minute measurements were taken between 8:00 A.M. and 11:00 A.M. Measurements of L_{eq} are considered representative of the noise levels throughout the day, and summarized in **Table 4.13-1: Existing Noise Measurements**.

Table 4.13-1: Existing Noise Measurements

Site	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	Southwest of Project Site on South Pine Street	57.2	43.3	71.5	8:57 A.M.
2	Southeast of the project site on San Gabriel Boulevard	74.6	54.4	81.3	9:48 A.M.
3	West corner of South Pine Street and East Live Oak Street	60.9	46.8	71.6	9:19 A.M.
4	East of the Project Site on East Live Oak Street	60.9	51.1	77.6	10:14 A.M.
Source: Noise measurements taken by Kimley-Horn, June 7, 2023.					

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect varying noise sensitivities associated with uses. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive land uses surrounding the Project consist of mostly residential communities to south, east, and west of the Project Site. As shown in **Exhibit 4.13-1: Noise Measurement Locations**, to quantify noise exposure levels near the Project Site, four receptor locations were chosen for noise measurements surrounding the Project Site closest to sensitive receptors including**:**

- #1: Multi-family residences south of the Project Site at 230 South Pine Street
- #2: Data for Children after school program to the southeast of the Project Site on San Gabriel Boulevard
- #3: Multi-family residences on the western corner of South Pine Street and East Live Oak Street, to the west of the Project Site
- #4: Multi-family residences east of the Project at 818 East Live Oak Street east of the Project Site

EXHIBIT 4.13-1: NOISE MEASUREMENT LOCATIONS
Rubio Village Mixed-Use Project

NOT TO SCALE

Kimley»Horn

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Impact Analysis

4.13a Would the Project result in generation 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.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction. Noise generated by construction equipment can reach high levels. During construction, exterior noise levels could affect the noise-sensitive receptors near the construction site. Construction activities would include site preparation, grading, foundations, building construction, and architectural coating. Such activities may require three dozers and four tractors during site preparation; one excavator, grader, dozer, and three tractors during grading; three tractors, one crane, three forklifts, one generator and welder during foundations; one crane, generator, and welder and three forklifts during building construction; one tractor, and one air compressor during architectural coating.[38] Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including dozers, excavators, loaders, forklifts, and air compressors, can reach high levels. L_{max} is the maximum level of a noise source environment and is often used as a threshold value for typical noise levels of construction activities. Typical noise levels associated with individual construction equipment are listed in **Table 4.13-2: Typical Construction Noise Levels.**

Table 4.13-2: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80

[38] Construction equipment list provided by Applicant on April 12, 2023.

Equipment	Typical Noise Level (dBA) at 50 feet from Source
Paver	80
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. The impact analysis is based on the potential temporary increase in ambient noise and the construction time limits in the SGMC Section 150.003 including the allowable hours of construction. Construction activity would occur within the allowable hours of construction including Mondays through Fridays 7:00 A.M. to 7:00 P.M and between the hours of 8:00 A.M. and 4:00 P.M. on Saturday. Construction is prohibited outside of these hours and on holidays.

The Project's existing surroundings include both residential and commercial uses. Following the Federal Transit Administration's (FTA) methodology for quantitative construction noise assessments, FHWA's Roadway Construction Noise Model (RCNM) was used to predict construction noise. Per the FTA Transit Noise and Vibration Manual, when calculating construction noise, all construction equipment is assumed to operate at the center of the active construction zone. During construction, equipment would be operating throughout the Project Site and not all equipment would be operating at the point closest to the sensitive receptors. Considering the distance between the center of the Project Site and the sensitive receptors, this is a reasonable assumption. Therefore, the distance used in the model was approximately 180 feet from the center of the Project Site to the nearest sensitive receptor (adjacent to the Project Site); refer to **Appendix G** for construction noise modeling results. The SGMC does not establish quantitative exterior construction noise standards. While the SGMC does not establish quantitative construction noise standards, this analysis conservatively uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential uses to evaluate construction noise impacts.[39]

Table 4.13-3: Project Construction Noise Levels shows the maximum noise levels for each individual construction phase, assuming simultaneous use of equipment assumed for each phase at a distance of 180 feet. The highest exterior noise level at the residential use to the south of the Project Site is estimated to be 78.2 dBA L_{eq}, which would not exceed the FTA's threshold of 80 dBA L_{eq} for residential uses.

[39] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018, Table 7-3, page 179.

Table 4.13-3: Project Construction Equipment Noise Levels

Construction Phase	dBA L_{eq} at 180 Feet
Site Preparation	76.1
Grading	76.1
Foundations	78.2
Building Construction	78.2
Paving	76.2
Architectural Coating	62.6
Source: FHWA, Roadway Construction Noise Model, 2006. Refer to **Appendix G** for noise modeling results. FHWA, Construction Noise Handbook, Chapter 9: Construction Equipment Noise Levels and Ranges, 2006.	

Although the noise generated by Project construction would be higher than ambient noise levels, which may result in a temporary increase in ambient noise levels, construction would be temporary and cease once Project construction is completed. Construction activities would comply with SGMC Section 150.003 and would be prohibited outside the hours of Mondays through Fridays 8:00 A.M. to 6:00 P.M. While construction may cause short-term annoyance to adjacent uses, it would be temporary and restricted to the hours permitted by the City's Noise Ordinance. Therefore, construction noise impacts would be less than significant.

Operational Noise

Project implementation would introduce new noise sources in the Project vicinity. The Project's primary noise sources that could potentially impact nearby noise-sensitive land uses include parking, mechanical equipment (e.g., HVAC, etc.), conversation in open space gathering areas, and trash/recycling truck pickup noise.

Parking Lot Noise. According to the ground floor plan, parking stalls would be located in the center of Building A. According to the Traffic Impact Study, the Project would generate up to 70 trips during the peak hour. For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the parking lot, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq(h)} = SEL_{ref} + 10 \log (NA/1{,}000) - 35.6$$

Where:

$L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

NA = number of automobiles per hour

35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour

Using the FTA's reference noise level of 92 dBA SEL[40] at 50 feet from the noise source, the Project's highest peak hour vehicle trips would generate noise levels of approximately 44.9 dBA L_{eq} at 50 feet from the parking lot. The nearest sensitive receptors (to the south) are located approximately 45 feet from the nearest on-site parking area (measured from receptor property line to the nearest parking lot area). Conservatively assuming that all vehicles would park at a location nearest to sensitive receptors rather than dispersed throughout all available parking and based strictly on distance attenuation, parking lot noise at the nearest receptor would be 45.8 dBA, which is below City's normally acceptable residential exterior noise standard (55 dBA). Therefore, noise impacts from parking lots would be less than significant.

Mechanical Equipment. Potential stationary noise sources related to long-term Project operations include mechanical equipment (e.g., HVAC equipment). A mechanical room is located at the northwest corner of the Project Site and mechanical equipment would likely be located on the rooftops of retail spaces on the east side of the Project Site. The nearest receptors to mechanical equipment are the multi-family residences approximately 65 feet west from the nearest mechanical equipment location on the Project Site. Mechanical equipment typically generates noise levels of approximately 52 dBA at 50 feet.[41] Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law of sound propagation. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the noise source. Mechanical equipment would be located toward the northwest corner of the ground floor. The distance from the proposed mechanical equipment to the property line of each sensitive receptor was measured and calculated. Noise levels from mechanical equipment at the Project Site would be 49.7 dBA L_{eq} at the nearest residential uses to the west and would not exceed the City's daytime or nighttime standards of 55 dBA or 50 dBA, respectively. Therefore, the Project would result in a less than significant impact concerning mechanical equipment noise levels.

Trash/Recycling Truck Pickups. During loading and unloading activities of trash and recycling pickups, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities, and opening and closing of the trash/recycling bins. The Project would have two trash rooms located on the ground floor, one designated for commercial trash and another designated for residential trash. Both trash collection areas would be shielded from surrounding sensitive receptors. Therefore, on-site collection of trash/recycling would not contribute to increases in ambient noise. In addition, trash/recycling truck pickup activity servicing the Project area currently occurs under existing conditions and would not be a new noise source. The hours of trash/recycling pick up activity would be dependent on the service provider and not be regulated by the Project. Therefore, the Project would result in less than significant impacts concerning trash/recycling truck pickup noise levels.

[40] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

[41] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, June 26, 2015.

Outdoor Open Space. The Project would include several outdoor living spaces for residents of the new buildings. Users of the open space would be dispersed throughout the outdoor areas and would not present a concentrated noise source. Noise levels from human conversation was estimated based on potential maximum capacity of each of the outdoor living spaces. Although the outdoor living spaces would not be completely open and shielding would be provided by building walls and architectural features, noise level reductions have not been assumed in the modeling. Conservatively, maximum noise levels reaching each receptor from each outdoor living space has been combined to provide an overall worst-case estimate of open space noise. Note that amplified sound systems would not be provided on proposed open living spaces.

Noise from female adults and male adults talking at a raised level is approximately 63 dBA and 65 dBA, respectively, at a distance of 3 feet.[42] As a conservative analysis, it is assumed that each outdoor living space would be at full capacity and that half of the visitors would be male and half female. Of the adults, half would be talking simultaneously (assuming approximately half of the occupants talking and the other half listening). According to the California Fire Code Section 1004, Table 1004.5, *Maximum Floor Area Allowances per Occupant*, the occupancy load for business areas is 150 square feet per occupant.

A pocket park would be located along Pine Street with a total of 27,048 square feet. The ground floor open space would allow for approximately 180 occupants with 90 speaking at raised levels. Open space would also be located on the third floor courtyard in the center of the Project. However, this space would be enclosed by the Project building and noise generated would be shielded from nearby receptors. Noise levels from outdoor open space at the Project Site would be 53.2 dBA L_{eq} at the nearest residential uses to the west and would not exceed the City's daytime standard of 55 dBA. Therefore, the Project would result in a less than significant impact concerning outdoor open space noise levels.

Composite On-Site Noise Levels. An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the nearest noise-sensitive receptors. **Table 4.13-4: On-Site Composite Noise Levels** details the on-site noise levels from the Project Site at the nearest residential uses. As shown in **Table 4.13-4**, the composite on-site operational noise attributable to the Project would result in a maximum increase in ambient conditions of 1.0 dBA L_{eq} at the residential uses located immediately west and south of the Project Site. In general, an increase of 3 dBA is considered to be barely perceptible, and a 5 dBA change in noise levels is required before any noticeable change in community response would be expected.[43] Therefore, the Project would not result in a significant permanent increase in ambient noise levels.

[42] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

[43] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, and FHWA, Noise Fundamentals, 2017.

Table 4.13-4: On-Site Composite Noise Levels

Receptor	Maximum On-Site Noise Levels by Source (dBA L_{eq})			Combined Noise Level at Receptor (dBA L_{eq})	Ambient Noise Level (dBA L_{eq})	Ambient + Combined Project Noise (dBA L_{eq})	Incremental Increase over Ambient (dBA L_{eq})
	Parking	Mechanical Equipment	Open Space Ground Floor				
1. Multi-Family Residential (SW)	45.8	47.4	45.6	51.1	57.2	58.2	1.0
2. After School Program (SE)	30.9	43.4	38.4	44.8	74.6	74.6	0.0
3. Multi-Family Residential (W)	41.9	49.7	53.2	55.0	60.9	61.9	1.0
4. Hotel (E)	34.5	44.4	41.5	46.5	60.9	61.1	0.2
Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to Appendix A for noise modeling results.							

Traffic Noise. The Project is anticipated to generate 1,227 net daily trips, with up to 70 trips during the A.M. peak-hour and up to 57 trips during the P.M. peak-hour. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.[44] According to the San Gabriel General Plan Mobility Element, the Average Daily Traffic (ADT) Volumes for a six-lane arterial such as San Gabriel Boulevard located near the Project vicinity is 50,000.[45] As noted above, the Project would result in approximately 1,227 net daily trips, which is not enough to double the existing traffic volumes on San Gabriel Boulevard, or nearby through streets. The Project would not generate enough traffic to result in a noticeable 3-dBA increase in ambient noise levels. Therefore, the Project would result in a less than significant impact from Project-related traffic noise.

4.13b Would the Project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Construction activities would occur as close as 23 feet from adjacent residential buildings. **Table 4.13-5: Typical Construction Equipment Vibration Levels** identifies vibration velocity levels at 23 feet and 27 feet for various types of equipment likely to operate at the Project Site during construction.

[44] According to the Caltrans Technical Noise Supplement to Traffic Noise Analysis Protocol (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

[45] City of San Gabriel, General Plan, Chapter 3 – Mobility. Street Classifications, 2004.

Table 4.13-5: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 23 Feet (in/sec)	Peak Particle Velocity at 25 Feet (in/sec)
Vibratory Roller	0.21	0.187
Large Bulldozer	0.089	0.079
Loaded Truck	0.076	0.068
Small Bulldozer	0.003	0.003
Source: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.		

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) is used to evaluate construction vibration impacts related to potential building damage. Based on the Caltrans criteria, construction vibration impacts would be significant if vibration levels exceed 0.5 inches per second peak particle velocity (in/sec PPV) at older residential structures, which is the limit for potential building damage at these structures. As shown in **Table 4.13-5,** the vibration velocities at 23 feet from construction equipment could be up to 0.21 in/sec PPV at the nearest structure. Therefore, construction vibration would not exceed the 0.5 in/sec PPV threshold of structural damage to older residential structures, and vibration impacts during Project construction would be less than significant.

Operations

The Project would not involve railroads or substantial heavy truck operations. Therefore, Project operations would not generate excessive groundborne vibration. Impacts from operational vibration would be less than significant.

4.13c Would the Project be 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 nearest airport to the Project Site is San Gabriel Valley Airport located at 4233 Santa Anita Avenue in the City of El Monte, approximately 3.5 miles to the southeast. There are no private airstrips located near the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Therefore, the Project would not result in the exposure of residents or those working in the Project area to excessive noise levels, and there would be no impacts.

4.14 Population and Housing

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

Impact Analysis

4.14a Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would consist of 225 multi-family residential units and approximately 13,449 SF of commercial uses (restaurant/retail). The 225 multi-family residential units are comprised of 12 studios, 179 one-bedroom units, 31 two-bedroom units, and 3 three-bedroom units.

Based on the City's average household size of 3.2, the 225 multi-family residential units would result in a population increase of approximately 720 residents.[46] Additionally, based on the employment generation factor of 2.2371 per 1,000 square feet, the 13,449 SF of commercial uses would result in approximately 30 employees.[47]

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. SCAG's growth forecasts estimate the City's population to reach 45,800 persons by the year 2045, representing a total increase of 5,100 persons between 2016 and 2045.[48] The Project's anticipated population growth (720 persons) would represent approximately 1.6 percent of the City's anticipated 2045 population, and approximately 14 percent of the City's anticipated growth between 2016-2045. Thus, the Project's estimated population growth would be within regional growth projections of the city.

[46] SCAG, Profile of the City of San Gabriel, Local Profiles Report, May 2019, https://scag.ca.gov/sites/main/files/file-attachments/sangabriel_localprofile.pdf?1606011181. Accessed June 19, 2023.

[47] San Gabriel Unified School District, 2018. Commercial/Industrial Development School Fee Justification Study, March 15, 2018.

[48] SCAG, 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 June 19, 2023.

Overall, 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. As a result, the Project would result in less than significant impacts with regards to substantial unplanned population growth.

4.14b Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not displace existing housing or require construction of replacement housing elsewhere. No housing is located on-site, and no replacement housing would be necessary. Therefore, no impact would occur.

4.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

Impact Analysis

4.15a Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 fire protection?

Less Than Significant Impact. The San Gabriel Fire Department (SGFD) provides fire protection and paramedic services to the City. The SGFD is a member of Verdugo Fire Communications, which provides fire protection, fire prevention, and emergency services from Burbank to Monrovia to Montebello as well as Bob Hope Airport. Using GPS and Computer Aided Dispatch (CAD), Verdugo dispatches the closest available unit to an emergency call regardless of City boundaries. The City regularly sends resources to and receives emergency equipment and personnel from other agencies as the need arises.

Two fire stations serve the City of San Gabriel: Fire Station 51 located at 1303 Del Mar Avenue, and Fire Station 52, located at 115 North Del Mar Avenue. The two stations house two engines, one paramedic ambulance, one division chief, and an urban search and rescue vehicle. The closest fire station to the Project Site is Fire Station 52, located approximately 0.7 miles northwest.

The Project would create an increased demand for fire protection services as it would increase residents and employees on-site. However, 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 as development of the Project Site has been anticipated since 2006 as part of the San Gabriel Center Project and has been accounted for as part of fire protection in the City. Further, the 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. The City would collect a one-time development impact fee in accordance with SGMC Section 154.004, which is imposed on all new development to pay the costs in upgrading the City's fire facilities, as needed. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 fire protection. Impacts would be less than significant.

4.15b Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 police protection?

Less Than Significant Impact. The San Gabriel Police Department (SGPD) provides police protection services to the City and operates approximately one mile southwest of the Project Site at 625 South Del Mar Avenue. The City is served by 72 total employees which includes 54 sworn Police Officers and 18 civilian employees.[49] Police services are funded through the City's General funds, which includes funds collected from property and sales tax and development impact fees.

The Project would create an increased demand for police protection services as it would increase residents and employees on-site. However, 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 as development of the Project Site has been anticipated since 2006 as part of the San Gabriel Center Project and has been accounted for as part of police protection in the City. Project construction and operation would be subject to compliance with SGMC Chapter 150, Building

[49] City of San Gabriel, San Gabriel Police Department, https://www.sangabrielcity.com/679/San-Gabriel-Police-Department. Accessed June 19, 2023.

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 fee in accordance with SGMC Section 154.004, 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). Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 police protection. Impacts would be less than significant.

4.15c Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 schools?

Less Than Significant Impact. The Project Site is within the boundaries of the San Gabriel Unified School District (SGUSD), which operates eight schools, including five elementary schools, one middle school, and two high schools.[50] The closest SGUSD schools include Del Mar High School (0.7 miles southwest), Roosevelt Elementary School (0.7 miles southeast), and Washington Elementary School (1.1 miles southeast).

The Project includes the development of 225 dwelling units, which could generate additional students in the Project area. However, the Project would not significantly increase the need for school facilities, as development of the Project Site has been anticipated since 2006 as part of the San Gabriel Center Project and has been accounted for as part of school facility demand in the City. Furthermore, the Project would be required to comply with SB 50 requirements, which allows school districts to collect impact fees from new development, thereby mitigating potential impacts to school facilities. Thus, with payment of required SB 50 fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 schools. Impacts would be less than significant.

4.15d Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or

[50] San Gabriel Unified School District, *Schools,* https://www.sgusd.k12.ca.us/. Accessed June 19, 2023.

other performance objectives for parks?

Less than Significant Impact. The City of San Gabriel Community Services Department operates and maintains six parks, totaling 19 acres.[51] The nearest park to the Project Site is Smith Park, approximately southwest of the site.

The Project does not propose new or physically altered parks or recreational facilities. The Project proposes common open space along East Live Oak Street, South San Gabriel Boulevard, and along the Rubio Walsh. The Project would provide 43,810 SF of open space, comprised of 27,048 SF of ground floor open space and 16,762 SF in a third floor courtyard. The Project would also include 10,667 square feet of private open space area in the form of residential balconies and patios.

Moreover, the City would collect a one-time open space and recreation development impact fee in accordance with SGMC Section 154.001*,* 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. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 parks. Impacts would be less than significant.

4.15e Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 other public facilities?

Less than Significant Impact. The San Gabriel Library, located approximately 0.9 miles southwest of the Project Site at 500 South Del Mar Avenue, is part of the larger County of Los Angeles Public Library system. The San Gabriel Library is approximately 13,719 SF and includes a meeting room, space for children, space for teens, 10 public computers, 2 teen computers, 6 laptops and hotspot kits, 4 homework center computers, and 2 early learning computers.[52] As discussed above, the Project would create an increased demand for libraries as it would increase residents and employees on-site that could patronize the San Gabriel Library. However, the Project would not induce significant or unplanned population growth and would not result in the need for new or physically altered library facilities as development of the Project Site has been anticipated since 2006 as part of the San Gabriel Center Project and has been accounted for as part of the potential residents within the City. Therefore, the Project would not increase demand for other public

[51] GreenPlay, LLC, Dream Your Park: San Gabriel Parks and Open Space Master Plan, August 2018, https://www.sangabrielcity.com/DocumentCenter/View/10093/San-Gabriel---Master-Plan-Final. Accessed July 19, 2023.

[52] LA County Library, San Gabriel Library, https://lacountylibrary.org/san-gabriel-library/. Accessed July 19, 2023

facilities such as libraries, in a manner that would adversely impact existing facilities. Impacts would be less than significant.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
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?			X	

Impact Analysis

4.16a 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?

4.16b 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. See **Threshold 4.15d** above. The Project's residents would be expected to utilize on-site facilities, including the publicly accessible open space and private courtyards. The Project would also include an amenity space/multi-purpose room/gym and additional amenity space within Building A. Therefore, impacts to recreational facilities would be less than significant.

4.17 Transportation

The discussion below regarding potential impacts on transportation is based on the Traffic Impact Study (see **Appendix H: Traffic Impact Study**) prepared for the Project Site by Kimley-Horn.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				X
d) Result in inadequate emergency access?			X	

Impact Analysis

4.17a Would the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Regional access to the site is provided the Foothill Freeway (Interstate 210 [I-210]) north of the Project Site and the San Bernardino Freeway (I-10) south of the Project Site. Local access to the Project Site is provided via East Live Oak Street to the north and South San Gabriel Boulevard to the east. Public transit service is provided by the Montebello Bus Lines and by Metro. There are existing pedestrian sidewalks along San Gabriel Boulevard, East Live Oak Street, and South Pine Street. The Project would not impair existing pedestrian sidewalks or transit services along San Gabriel Boulevard, East Live Oak Street, and South Pine Street. The infill development would encourage the use of existing pedestrian and transit services in the Project area. The Project would also provide residential bike racks and storage lockers on site, encouraging additional multimodal transportation. Therefore, the Project would not conflict with any program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

4.17b Would the Project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact. In compliance with SB 743, the City developed a methodology for evaluating transportation impacts based on VMT for land use projects, which is consistent with the recommendations provided by the California Office of Planning and Research (OPR) in the Technical Advisory released in December 2018.[53] The City developed the Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessments (TS Guidelines), consistent with the OPR recommendations. 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:

[53] California Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, 2018.

- 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 limited to, the following are presumed to have 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)

Table 4.17-1: Project Trip Generation indicates the proposed Project's trip generation estimate based upon ITE Trip Generation Manual (11th Edition) trip generation rates.

Table 4.17-1: Project Trip Generation

Land Use	ITE Code	Unit	Trip Generation Rates [1]						
				AM Peak Hour			PM Peak Hour		
			Daily	In %	Out %	Total	In %	Out %	Total
Mid-Rise Residential W/ 1st Floor Commercial	231	DU	3.44	0.051	0.169	0.220	0.121	0.049	0.170
Strip Retail Plaza	822	KSF	54.45	1.416	0.944	2.360	3.295	3.295	6.590
Fast Casual Restaurant	930	KSF	97.14	0.715	0.715	1.430	6.903	5.648	12.550
Land Use	**Quantity**	**Unit**	**Trip Generation Estimates**						
				AM Peak Hour			PM Peak Hour		
			Daily[2]	In	Out	Total	In	Out	Total
Mid-Rise Residential w/ 1st Floor Commercial	225	DU	774	11	38	49	27	11	38
Strip Retail Plaza (<40k)	7.998	KSF	435	11	8	19	26	26	52
Fast Casual Restaurant	5.480	KSF	532	4	4	8	38	31	69
Total Before Internal Capture/Pass-by			**1,741**	**26**	**50**	**76**	**91**	**68**	**159**
Internal Capture (8% Daily, 8% A.M., 47% P.M.)			**-139**	**-2**	**-4**	**-6**	**-43**	**-32**	**-75**

Pass-By Reduction for Shopping Center (40% P.M.)	**-160**	**0**	**0**	**0**	**-9**	**-7**	**-16**
Pass by Reduction for Fast Casual Restaurant (44% of P.M.)	**-215**	**0**	**0**	**0**	**-9**	**-7**	**-16**
Total Project Trips	**1,227**	**24**	**46**	**70**	**34**	**23**	**57**

KSF = thousand square feet; DU = dwelling unit
1. Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2017.
Source: Kimley-Horn, Traffic Study, 2023.

The Project is estimated to generate approximately 1,227 trips on a daily basis, with 70 trips in the A.M. peak hour, and 57 trips in the P.M. peak hour. The Project would contain 13,478 SF of commercial space which is less than 50,000 SF and is not anticipated to lead to longer local trips, thus reducing or maintaining regional VMT. As such, the retail and restaurant portion of the Project meet the Project Type Screening threshold.

Based on the Screening Tool provide by SGVCOG, the Project Site would be located in a low VMT generating zone. Therefore, the Project would meet the Low VMT Area Screening threshold. Because the Project would meet both the Project Type and Low VMT Area Screening thresholds, the Project is presumed to have a less than significant VMT impact.

4.17c Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. Vehicular access would be provided from three driveways on East Live Oak Street, San Gabriel Boulevard, and Pine Street. A driveway leading to the subterranean and above-ground parking levels would be provided by the driveway off of East Live Oak Street. Building A would be served by the Pine Street driveway, and the ground floor circulation would be connected to Building A by South San Gabriel Boulevard. Internal drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers design for emergency vehicles and fire services. The proposed Project driveway and internal drive aisle configuration would be constructed pursuant of the City of San Gabriel Public Works Department and SGFD. The Project would not require any off-site roadway improvements.

Because of the nature of the proposed land use, the Project does not include the use of any incompatible vehicles or equipment on the site. No Project component would increase hazards to the public due to incompatible use; the mixed-uses proposed by the Project are consistent with the land use designations for the site and are compatible with surrounding land uses. All on-Sight distance at the Project driveway would be subject to compliance with applicable American Association of State Highway and Transportation Officials (AASHTO) Section 9.5.2: Sight Triangles sight distance standards. Therefore, no impacts would occur.

4.17d Would the Project result in inadequate emergency access?

Less Than Significant Impact. Emergency access is determined by the number of private and public access points, the width of the access point, and internal roadways serving a Project Site. As discussed in **Threshold 4.17c**, primary vehicular access to the Project Site is proposed via three

driveways on East Live Oak Street, San Gabriel Boulevard, and Pine Street. Pedestrian access from the sidewalk on East Live Oak Street, San Gabriel Boulevard, and Pine Street would be provided adjacent to the drive aisle into the building complex and parking area. The Project must meet applicable design standards and emergency access standards required by the City of San Gabriel Public Works Department and the SGFD. Additionally, according to the General Plan, the City has established the MHFP that establishes tactics to cope with local and regional hazards. Therefore, adequate emergency access to the would be provided. Impacts would be less than significant.

4.18 Tribal Cultural Resources

The discussion below regarding potential impacts on tribal cultural resources is based in part on AB 52 communications initiated by the City (see **Appendix I: AB 52 Communications**).

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

Impact Analysis

4.18ai Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k);

or

4.18aii Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact With Mitigation Incorporated. Chapter 532 Statutes of 2014 (AB 52) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource."

The Sacred Lands Files (SLF) search conducted by the NAHC indicated that the Project Site was positive for known sacred tribal lands. In compliance with PRC Section 21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC Section 21074. The City has contacted the tribal representatives of the tribe noted below. Correspondence to and from tribal representatives is included as **Appendix I**.

AB 52 Native American Groups Contacted:

- Gabrieleño Band of Mission Indians – Kizh Nation (Andrew Salas)
- Gabrieleño/Tongva San Gabriel Band of Mission Indians (Anthony Morales)
- Gabrieliño/Tongva Tribe (Linda Canderlaria)

The City initiated consultation with three tribes: the Gabrieleño Band of Mission Indians-Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and the Gabrielino Tongva Tribe pursuant to AB 52 in consultation on the Project on June 13, 2023. The Gabrieleño Band of Mission Indians-Kizh Nation initiated consultation on June 23, 2023. The Gabrieleño/Tongva Band of Mission Indians initiated consultation on July 12, 2023. Consultation with the Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrieleño/Tongva Band of Mission Indians concluded that the Project would have a high potential to cause significant adverse effects to several Historic/Prehistoric Tribal Resources as defined in PRC Section 21074, and impacts would be potentially significant. Based on feedback provided by the Tribes, the Project would be subject to compliance with **MM TCR-1** through **MM TCR-3**. Therefore, following compliance with **MM**

TCR-1 through **MM TCR-3**, the Project's potential impacts to tribal cultural resources would be mitigated to a less than significant level.

Mitigation Measures

Please also refer to mitigation measures provided in **Section 4.5: Cultural Resources**.

MM TCR-1 The Project shall retain a professional Native American monitor from or approved by a consulting Tribe. The monitor shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. If cultural resources are encountered, the Native American monitor will have the authority to request ground disturbing activities cease within 50-feet of discovery to assess and document potential finds in real time. Monitoring activities will cease when potential for significant buried resources have been exhausted (e.g., at the completion of construction excavation activity), as determined by the Qualified Archaeologist and in consultation with the Native American monitor. The Native American monitor and archaeological monitor will be present during construction excavation activity. Personnel needs would be determined during a pre-construction meeting.

MM TCR-2 If significant Pre-Contact (predating Native American contact with Europeans) and/or Post-Contact (postdating Native American contact with Europeans) cultural resources are discovered and avoidance cannot be ensured, the Qualified Archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the consulting Tribe retained Native American monitor for review and comment, as detailed within **MM CUL-2**.

MM TCR-3 The Applicant shall, in good faith, consult with the Tribe or Tribal Government that requested consultation under AB 52 retained Native American monitor on the disposition and treatment of any artifacts or other cultural materials if encountered during the Project grading.

4.19 Utilities and Service Systems

The discussion below regarding potential impacts on water supplies and wastewater facilities is based in part on the Sewer Capacity Study (see **Appendix J: Sewer Capacity Study**) prepared by Southland Civil Engineering and Survey, LLP.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

4.19a Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

i) Water

Less Than Significant Impact. A significant impact may occur if a Project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by surveyors, distributors, and service providers.

The Project would be served by the SGCWD, which encompasses approximately 4.2 square miles in the western region of the San Gabriel Valley. According to the SGCWD 2020 Urban Water Management Plan (2020 UWMP), the City's water is provided from groundwater, imported water, and recycled water. The City derives its groundwater supplies from two groundwater

basins, the Main San Gabriel Bain, and the Central Basin, with the San Gabriel Basin as the City's primary groundwater source. The SGCWD depends primarily on groundwater supplies from Main San Gabriel Basin (approximately 83 percent) and Raymond Basin (approximately 17 percent) and its existing and planned source of water supply.[54] Recycled water is available from a connection with the Metropolitan Water District of Southern California (MWD). The 2020 UWMP indicates that water supply will be able to meet full service demands through 2045 during normal years, for a single dry year, and multiple dry years. As noted in the 2020 UWMP, the SGCWD can accommodate water demand projections until 2045 with an estimated projected water demand of 38,700 feet per year (afy).

Water demand during Project construction would be required for dust control and cleaning of equipment. During construction, the contractor would bring their own portable bathroom and wash stations which would have their own self-contained water source and wastewater storage. These facilities would not connect to the adjacent sewer or water infrastructure. Therefore, Project construction would have a less than significant impact on water facilities.

As shown in **Table 4.19-1: Estimated Project Water Consumption**, Project operations would result in a total water demand of 69,600 gallons per day (gpd) or approximately 78.0 afy.[55]

Table 4.19-1: Estimated Project Water Consumption

Proposed Land Use	Amount	Consumption Rate[1]	Total Consumption (gpd)
Studios	12 DU	180 gallons/DU	2,160
One-Bedroom Unit	179 DU	240 gallons/DU	42,960
Two-Bedroom Units	31 DU	300 gallons/DU	9,300
Three-Bedroom Units	3 DU	360 gallons/DU	1,080
Retail	7.998 KSF	120 gallons/KSF	960
Restaurant	219 Seats	60 gallons/seat	13,140
Total Estimated Water Consumption			**69,600**

DU = dwelling units; KSF = 1,000 square feet; gpd = gallons per day
Notes:
1. Water consumption rates are assumed as 120 percent of the wastewater generation rates provided in the Sewer Capacity Study (see **Appendix J**).
Source: Southland Civil Engineering and Survey, LLP, Sewer Capacity Study, Table 1: Project Site Sewage Flow.

No off-site water improvements are proposed. The Project's planned growth would be consistent with the growth estimates of the 2020 UWMP. SGCWD will have an adequate combination of imported water and groundwater to meet future demand. Conservation and recycled water will further help SGCWD meet forecasted demands. Therefore, there would be adequate water supplies for the Project from existing entitlements and resources. Impacts related to the Project's water demand would be less than significant.

[54] Stetson Engineers Inc., San Gabriel County Water District 2020 Urban Water Management Plan, May 2021, page 6-3.
[55] 1 afy = 892.742 gpd.

ii) Wastewater Treatment

Less Than Significant Impact. 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. Wastewater generated in the City is treated by either LACSD's Whittier Narrows Water Reclamation Plant (WRP) located near the city of El Monte, the Los Cayotes WRP located in the City of Cerritos, or the San Jose Creek WRP located adjacent to the City of Industry. The Whitter Narrows WRP has a capacity of 15 million gallons per day (mgd); the Los Coyotes LACSD's integrated network of facilities known as the Joint Outfall System. 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 shown in **Table 4.19-2: Estimated Project Wastewater Generation**, it is estimated the Project would generate approximately 58,000 gpd (or 0.058 mgd) of wastewater.

Table 4.19-2: Estimated Project Wastewater Generation

Proposed Land Use	Amount	Wastewater Generation Rate	Average Daily Flow (gpd)
Studios	12 DU	150 gallons/DU	1,800
One-Bedroom Unit	179 DU	200 gallons/DU	35,800
Two-Bedroom Units	31 DU	250 gallons/DU	7,750
Three-Bedroom Units	3 DU	250 gallons/DU	900
Retail	7.998 KSF	100 gallons/KSF	800
Restaurant	219 Seats	50 gallons/seat	10,950
Total Estimated Wastewater Generation			**58,000**

DU = dwelling units; KSF = 1,000 square feet; gpd = gallons per day
Source: Southland Civil Engineering and Survey, LLP, Sewer Capacity Study, Table 1: Project Site Sewage Flow.

The Project is consistent with the Project Site's land use designation and zoning. Additionally, the Applicant would be required to pay sewer connection fees and ongoing user fees pursuant to SGMC Section 154.002 *Sanitary Sewer Impact Fee,* which 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 a development impact fee, standard sewer fees, and ongoing user fees would ensure the Project's impacts on existing wastewater facilities are adequately offset. Therefore, it is not anticipated that Project implementation would require construction of new or the expansion of existing wastewater facilities.

iii) Stormwater Drainage

Less Than Significant Impact. See **Threshold 4.10c(iii)**.

iv) Electric Power, Natural Gas, and Telecommunications

Less Than Significant Impact. See **Threshold 4.6a** regarding electric power and natural gas.

The Project Site is located in an urbanized area in the City that is served by existing telecommunication services. Natural gas services would be provided by SoCalGas, and electricity services would be provided SCE. AT&T and Charter Spectrum would provide telecommunication services to the site. The Project would require installation of new underground telecommunication lines (for internet, telephone, and other services) to serve the office uses proposed on the Project Site. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. As telecommunication providers already deliver their services to a large number of residents and commercial users in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

4.19b Would the Project 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 **Threshold 4.19a**, the SGCWMD's 2020 UWMP indicates that water supply will be able to meet full service demands through 2045 during normal years, a single dry year, and multiple dry years. As noted in the 2020 UWMP, the SGCWMD can accommodate Project's estimated water demand of 69,600 gpd or 78.0 afy. The City aims to meet this demand by decreasing its reliance on imported water by pursuing a variety of water conservation strategies and increasing local supplies.[56] Therefore, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years from existing entitlements and resources. Therefore, impacts related to water supply would be less than significant.

4.19c Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving a project would be exceeded. The Project's estimated wastewater generation of 58,000 gpd (0.058 mgd) generation of wastewater can be accommodated as part of the Whittier Narrows WRP and JWPCP. The Project's wastewater would discharge to the local City sewer line for conveyance to

[56] Stetson Engineers, Inc, San Gabriel County Water District 2020 Urban Water Management Plan.

a SGCWD trunk sewer. The regional trunk sewers deliver wastewater to one or more water reclamation plants owned by LACSD for treatment. Impacts would be less than significant.

4.19d Would the Project 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?

4.19e Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity at the County is estimated at 148.40 million tons, with a total estimated daily disposal rate of 34,305 tons per day (tpd).[57] In addition to in-County landfills, out-of-County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the 2019 CoIWMP Annual Report, the County anticipates that future Class III disposal needs can be adequately met through 2034 (the Annual Report's horizon year) through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, concrete which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 4.19-3: Solid Waste Generation,** C&D debris for the Project is estimated to be approximately 617 tons. This estimate is conservative as it assumes no reductions in waste generation would occur due to recycling.

Table 4.19-3: Solid Waste Generation

Land Use	Size	Waste Generation Rate	Waste Generated	
			Pounds (lb)	Tons
Construction[1]				
Total Square Footage	306.793 KSF	4,020 lb/KSF	1,233,308 lb	617 tons
Operations[2]				
Multi-Family Residential Units	225 DU	4 lb/DU/day	900 lb/day	0.45 tpd
Commercial	13.449 KSF	13 lb/KSF/day	175 lb.day	0.09 tpd
		Total Operational Waste	1,075 lb/day	0.54 tpd

KSF = 1,000 square feet ; lb = pounds; DU = dwelling unit; tpd = tons per day

1. The construction waste generation rate of 4,020 lb/ksf is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.
2. Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed July 20, 2023.

[57] County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF. Accessed July 20, 2023.

Residual wastes such as trash packing materials, and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations.

All construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in SGMC Chapter 53: Diversion of Construction and Demolition Waste. Pursuant of AB 939, each County is required to prepare and administer a ColWMP and continually evaluate landfill disposal needs and capacity as part of the preparation of the ColWMP Annual Report.

As detailed in **Table 4.19-3**, based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate 0.54 tpd. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 148.40 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

Additionally, the City of San Gabriel General Plan provides a long-range policy guide to address changes to the City and a roadmap for future development. The General Plan outlines goals and actions that are applicable to solid waste and the proposed Project as follows:

Chapter 7: Open Space

Target 5.7.3: Reduce the generation of solid wastes, including hazardous waste and recycle those materials that are used, to slow the filling of local and regional landfills, in accord with the California Integrated Waste Management Act of 1989.

> **Action 5.7.3.2**: Encourage builders to incorporate interior and exterior storage areas at new or remodeled public and private development projects to make recycling activities more convenient.

During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGreen Code, State regulations, and City regulations regarding solid waste management and reduction. Impacts would be less than significant.

4.20 Wildfire

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

Impact Analysis

4.20a Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

4.20b Would the Project, 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?

4.20c Would the Project 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?

4.20d Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As discussed in **Threshold 4.9g**, according to CAL FIRE, the Project Site is not located within a VHFHSZ for both an LRA and SRA. Therefore, there would be no impact.

4.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the Project:				
a) 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?		X		
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Impact Analysis

4.21a 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 discussed throughout this Initial Study, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, State, and federal regulations) and the recommended mitigation measures.

As concluded in **Section 4.4: Biological Resources**, following compliance with **MM BIO-1**, which addresses potential impacts to migratory birds, and **MM BIO-2**, which addresses potential impacts to protected trees, the Project would not 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.

As concluded in **Section 4.5: Cultural Resources**, following compliance with **MM CUL-1** through **MM CUL-4**, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

As concluded in **Section 4.7: Geology and Soils**, following compliance with **MM GEO-1**, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As concluded in **Section 4.18: Tribal Cultural Resources**, following compliance with **MM TCR-1** through **MM TCR-3**, the Project could not cause an adverse change in the significance of a tribal cultural resource.

4.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. CEQA Guidelines Section 15065(a)(3) defines "cumulatively considerable as times when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The proposed Project would result in significant impacts unless mitigated for the following environmental issues: biological resources, cultural resources (archaeological resources), geology and soils (paleontological resources), and tribal cultural resources. The impacts associated with these resource areas are localized, thus, would not result in cumulative impacts. Mitigation measures have been prepared for each of these environmental issue areas to reduce impacts to a less than significant level.

All other Project impacts were determined either to have no impact or to be less than significant following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, the proposed Project would not result in any cumulatively considerable significant impacts.

4.21c Does the Project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant Impact. A significant impact may occur if the Project has the potential to result in significant environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. All potential impacts of the Project have been identified in the respective sections of this Initial Study, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant levels. As such, upon implementation of mitigation measures identified and compliance with existing regulations, the proposed Project would not have significant environmental effects, and the Project would not have substantial adverse effects on human beings, directly or indirectly. Therefore, impacts would be less than significant.