INITIAL STUDY

for the

OAK PARK MONROVIA SPECIFIC PLAN PROJECT

Prepared for:

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DECEMBER 2023

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1.0 INTRODUCTION

The proposed Oak Park Monrovia Specific Plan Project (Project) is located at 150 West Colorado Avenue and 125 West Olive Avenue in Monrovia, California. The Project Site includes Assessor's Parcel Numbers [APNs] 8516-026-036, -037, -039, and -043. The Oak Park Monrovia Specific Plan is proposed to revitalize an existing multifamily property by the owner and manager of the property. Oak Park is a 156-unit apartment complex located west of Myrtle Avenue that occupies the majority of the block between Colorado Boulevard, Olive Avenue and Myrtle and Primrose Avenues. The 2.7 acre Project Site is currently developed with two, three-story buildings, an inner courtyard, two parking structures, and additional surface parking originally built in the 1970s containing 145 stalls. The existing buildings include 54 units that are required by covenant to be rented to senior citizen households, as well as 96 units that are occupied by households with below-market incomes according to a SB 330 Replacement Housing Evaluation conducted by Keyser Marston Associates in April 2023. A new 6-story multifamily building containing 269 units is proposed, including replacement of the existing senior and affordable housing units to create a mixed-income and mixed-age community. A 5,471 square foot public parklet is proposed on Primrose Avenue as part of the new landscaping planned along the street frontages of the Project Site to provide an outdoor space connecting the new building to the surrounding neighborhood.

The Project includes proposed amendments to the General Plan, Zoning Code, and Zoning Map. The proposed General Plan Amendment would change the Land Use Designation to Planned Development and the proposed Zoning Code and Map change would change the zoning to Oak Park Monrovia Specific Plan. These amendments are requested to increase the allowable density on the property from the existing Residential High (RH) designation, which allows 54 units to per acre, to a Planned Development/Specific Plan designation allowing 99.6 units per acre. The proposed Planned Development/Specific Plan designation would define development standards including density, floor area, and unit size for the Project Site.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

Following a preliminary review of the project in accordance with Section 15060 of the California Code of Regulations (CCR), the City of Monrovia (City) determined the project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA).

In accordance with Sections 15051 and 15367 of the CCR, the City is serving as the Lead Agency for the project. Under CEQA (Public Resources Code Section 21000-21177) and pursuant to Section 15063 of the CCR, the City undertook the preparation of an Initial Study to determine

if the project would have any significant effects on the environment. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may result in a significant effect on the environment, preparation of an Environmental Impact Report (EIR) is required. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency may prepare a Negative Declaration (or Mitigated Negative Declaration). Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Section 21080[c], Public Resources Code).

1.2 PURPOSE

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

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

1.3 CONSULTATION

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

proposed Project, the City has not identified any Responsible or Trustee Agencies for the proposed Project.

Consultation with California Native American tribes traditionally and culturally affiliated with the Project area requested is required pursuant to Public Resources Code Section (PRC) 21080.3.1 (b, c).

The City has provided formal notification of this proposed Project to Native American tribes that have requested project notifications from the City pursuant to AB 52/PRC 21080.3.1 (b).

In addition, the City has provided notification to tribes identified by the Native American Heritage Commission (NAHC) of the opportunity to consult pursuant to California Government Code Section 65352 (SB 18, Required Notification for Adoption of Any Specific Plan).

No California Native American tribes have requested consultation as of the date of this Initial Study.

1.4 INCORPORATION BY REFERENCE

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

- *Monrovia General Plan* (November 2022). The Monrovia General Plan (General Plan), updated in February 2020 and November 2022, is a long-range planning document that guides decisions related to land use. The General Plan includes the following eight elements: Land Use, Circulation, Housing, Safety, Noise, Open Space, Conservation, and Environmental Justice. The City completed a Focused General Plan Update in November 2022 that involved updating the Housing and Safety Elements and adding the new Environmental Justice Element to the General Plan.
- *Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (January 2008)*. The Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (State Clearinghouse Number [SCH No.] 2007021135) (LUC EIR) evaluates the environmental effects associated with the adoption and implementation of the proposed Land Use and Circulation Elements initiated by the City of Monrovia.
- *Monrovia 2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment Mitigated Negative*

Declaration (October 2022). This Mitigated Negative Declaration (State Clearinghouse Number [SCH No.] 2022080729) determined the effects of adopting and implementing these elements of the General Plan and approval of the related Zoning Text Amendment would be less than significant.

- *Monrovia Municipal Code*. The Monrovia Municipal Code (Municipal Code), Codified through Ordinance 2013-15 Section 2, 2003, consists of codes and ordinances adopted by the City. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety. Title 17, Zoning (Zoning Ordinance), includes an official land use plan for the City and is adopted and established to serve the public health, safety and general welfare and to provide the economic and social advantages resulting from an orderly planned use of land resources.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

2.1.1 Project Location

The Project Site is located in the City of Monrovia (City), an approximately 14 square mile community in the foothills of the San Gabriel Mountains in the San Gabriel Valley of Los Angeles County as shown in **Figure 1: Regional Location**. The City is bordered by the Angeles National Forest to the north and a number of other small cities, including Arcadia to the west, Bradbury and Duarte to the east, and to the south by a community known as Mayflower Village within the unincorporated area of Los Angeles County.

As shown in **Figure 2: Project Location**, the Project Site is approximately 0.6-mile north of the I-210 (Foothill) Freeway and one block west of Old Town Monrovia. The Project Site is located west of Myrtle Avenue and occupies the majority of the block between Colorado Boulevard, Olive Avenue and Myrtle and Primrose Avenues.

2.1.2 Surrounding Land Uses

The Project Site is bound by Colorado Boulevard to the north, Primrose Avenue to the west, Olive Avenue to the south and Falling Leaf Alley to the east. Uses surrounding the Project Site include restaurants, retail, and other commercial uses along Myrtle Avenue to the east; the Myrtle Olive business park, which includes a variety of commercial uses, to the south; a dental office to the immediate west along Primrose Avenue; single-family homes and the Spiritualist Church of Revelation to the west across Primrose Avenue; and existing multifamily residential buildings to the north across Colorado Boulevard.

2.1.3 Existing Site Conditions and Land Use Designations

As shown in **Figure 2**, the 2.7-acre Project Site is currently developed with two three-story multifamily residential buildings constructed in the late-1970s containing 156 residential units, two two-level parking structures built in 2011, at-grade parking, and landscape areas. The existing buildings include a mix of market rate, senior units, and units leased to households with below-market incomes.

Sidewalks are available on both sides of Colorado Boulevard, Olive Avenue, and Primrose Avenue adjacent to the Project Site. The existing sidewalk along Colorado Boulevard adjacent to the Project Site varies between 6 to 10 feet wide, the existing sidewalk along Olive Avenue adjacent to the Project Site varies between 6 to 10 feet wide, and the existing sidewalk along Primrose Avenue adjacent to the Project Site is approximately 10 feet wide. Pedestrian crosswalks

adjacent to the Project Site are available at nearby intersections of Colorado Boulevard/Primrose Avenue, Colorado Boulevard/Myrtle Avenue, and Olive Avenue/Myrtle Avenue. Existing angled street parking is located on Colorado Boulevard and along the north side of Olive Avenue adjacent to the Project Site. Existing improvements including street lighting, a retaining wall, and landscaping are also located on the north side of Olive Avenue. adjacent to the Project Site. Other existing right-of-way improvements and a bus stop are located along Primrose Avenue adjacent to the site.

An inbound only driveway along Primrose Avenue and one outbound only driveway along Colorado Boulevard provides access to the north surface parking lot. An inbound only driveway and outbound only driveway along Olive Avenue provides access to the south surface parking lot and access to the lower level of the southern parking structure. An additional driveway located along Colorado Boulevard provides access to the upper level of the northern parking structure. An east-west alley on the eastern edge of the Project Site, Falling Leaf Alley provides access to the lower level of the northern parking structure and upper level of the southern parking structure.

The Project Site is designated Residential High Density in the City's General Plan and is zoned Residential High (RH). The Residential High Density land use designation is applied in the General Plan where moderately high density multiple family structures are existing or planned and allows 54 dwelling units per acre of land. The RH Zone allows multifamily buildings with a density of 75% Floor Area Ratio (FAR) for lots over 15,000 square feet in size. The minimum floor area for multifamily units in the RH Zone is 600 square feet for 1-Bedroom, 800 square feet for 2-Bedroom, 1000 square feet for 3-Bedroom units.

2.2 PROJECT CHARACTERISTICS

The Project includes proposed amendments to the General Plan, Zoning Code, and Zoning Map. The proposed General Plan Amendment would change the Land Use Designation to Planned Development and the proposed Zoning Code and Map change would change the zoning to Oak Park Specific Plan. These amendments are requested to increase the allowable density on the property from the existing Residential High (RH) designation, which allows 54 units to per acre, to a Planned Development/Specific Plan designation allowing 99.6 units per acre. The proposed Planned Development/Specific Plan designation would define development standards including density, floor area, and unit size for the Project Site.

The amendments would allow a reduction in the building setbacks on the front and sides of the Project Site and would eliminate the required setback for the second story.

2.2.1 Development Proposal

The Project is a proposal to replace the existing multifamily residential buildings, parking structures and surface parking lots on the Project Site with a new 6-story multifamily residential building containing 269 units, including replacement of the existing senior and affordable housing units to create a mixed-income and mixed-age community. A relocation plan for residents of the existing protected housing units will be included as part of the Project.

The Project would contain 1-, 2- and 3- Bedroom units, including 51 1-Bedroom, 54 1-Bedroom Senior, 135 2-Bedroom and 29 3-Bedroom units. **Figures 6** to **11** present the elevations and floor plans for the proposed building.

Parking on the ground level of the building and a single subterranean parking level would contain 421 parking spaces. A public parklet is proposed on Primrose Avenue as part of the new landscaping planned along the street frontages of the Project Site to provide an outdoor space connecting the new building to the surrounding neighborhood.

Building Design

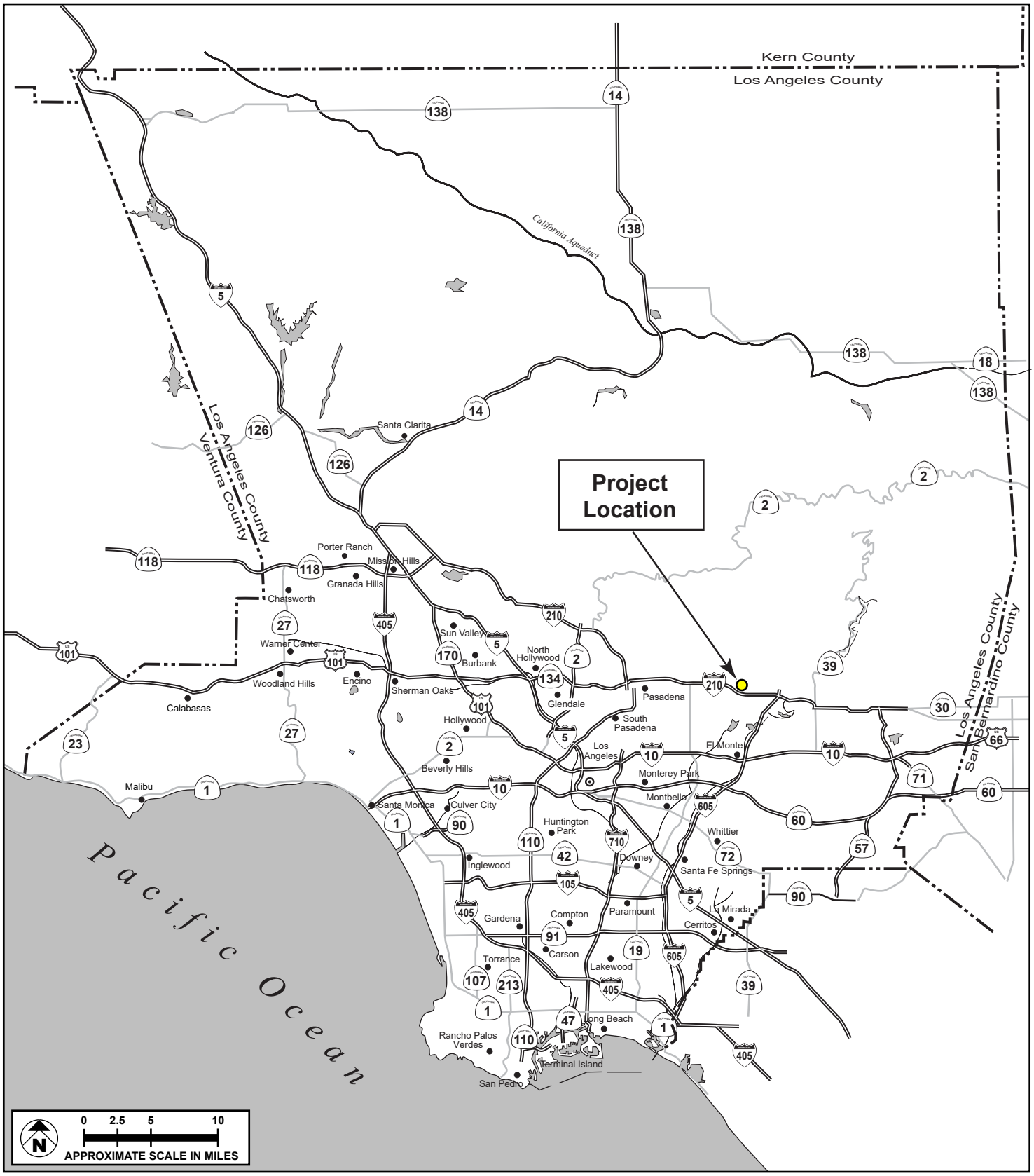
The design, scale, and materials for the proposed building were developed to complement existing buildings located around the Project Site. The materials and colors add to the articulation of the building on each façade, as shown in **Figures 4 and 5**, Elevations, with the ground level in brick, the middle floors in White, Beige and Dark Grey Cement Plaster, and Wood on the upper floors that step back from the edge of the building. The brick on the ground floor enhances the streetscape and retains consistency with nearby properties such as the Colorado Commons.

Deep step backs at the top floors maintain the feeling on the street of a building scaled to fit into the existing neighborhood. The project is designed to maximize the articulation along the elevations using recesses, colors, materials, and balconies. The fifth floor is stepped 30 feet from Colorado Boulevard and 35 feet from Olive Avenue. The sixth floor is not visible from the street as it is stepped back 50 feet from Olive Avenue, 65 feet from Colorado Avenue, and 90 feet from Primrose Avenue.

Along Primrose Avenue, the building is designed to step back at fourth and fifth floors, creating a low-scale character at the street level which is enhanced by a public parklet with shade areas and seating, enhanced materials, and both residential lobbies creating eyes on the street and pedestrian activity. Over half of the façade of the building along Primrose Street is set back approximately 75 feet behind the existing commercial medical office building located on the northwest corner of Primrose and Olive Avenues.

Landscape Design

Figures 12 to **15** present the landscape master plan for the Project. A permanent public parklet is proposed on Primrose Avenue with shade and seating areas for neighborhood use, landscaping along all three street elevations and Falling Leaf Alley, and landscaping on the roof decks.



SOURCE: Google Earth - 2023

FIGURE **1**

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Regional Location Map

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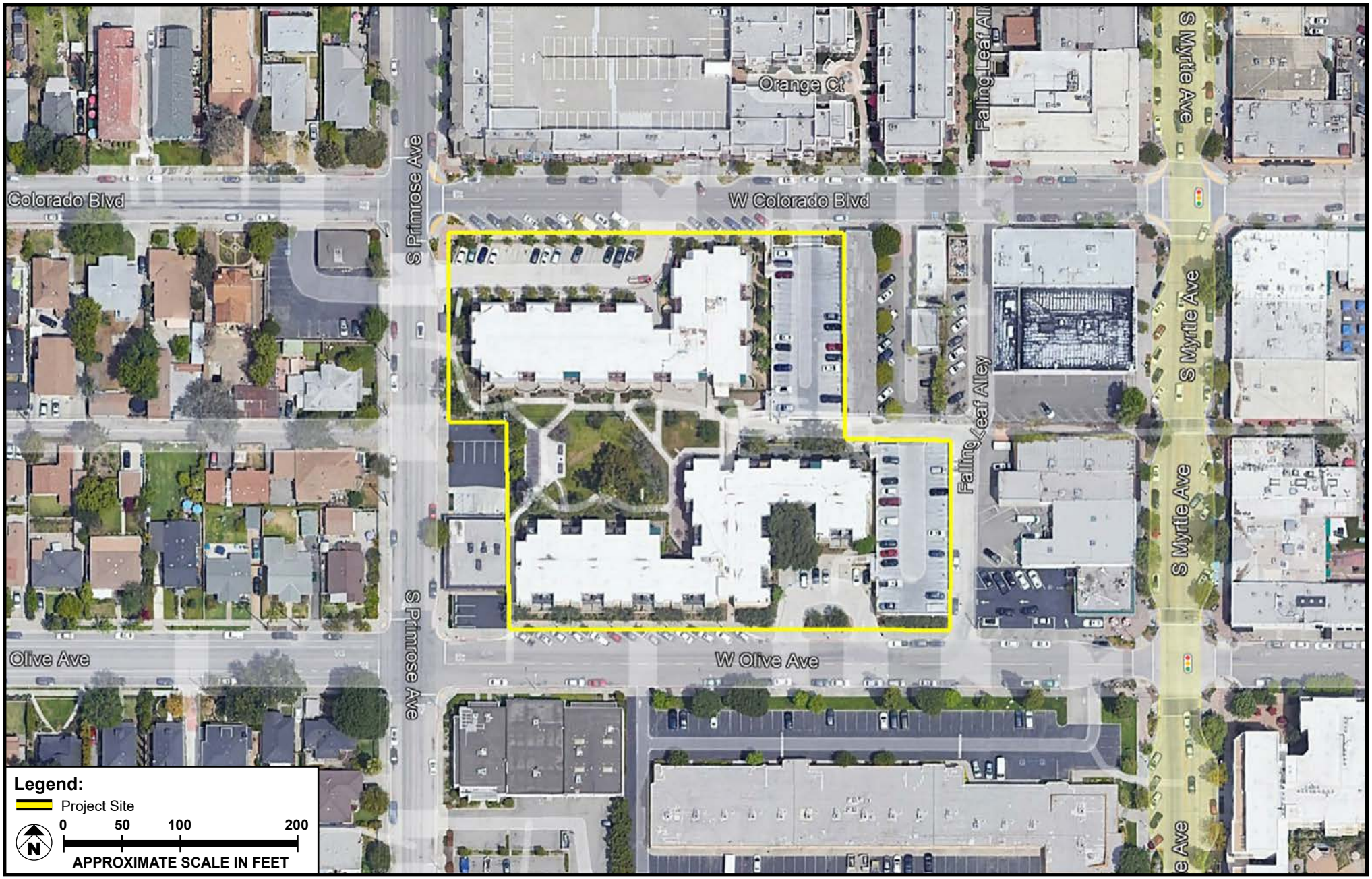

SOURCE: Google Earth - 2023

FIGURE **2**

Meridian Consultants

Project Location Map

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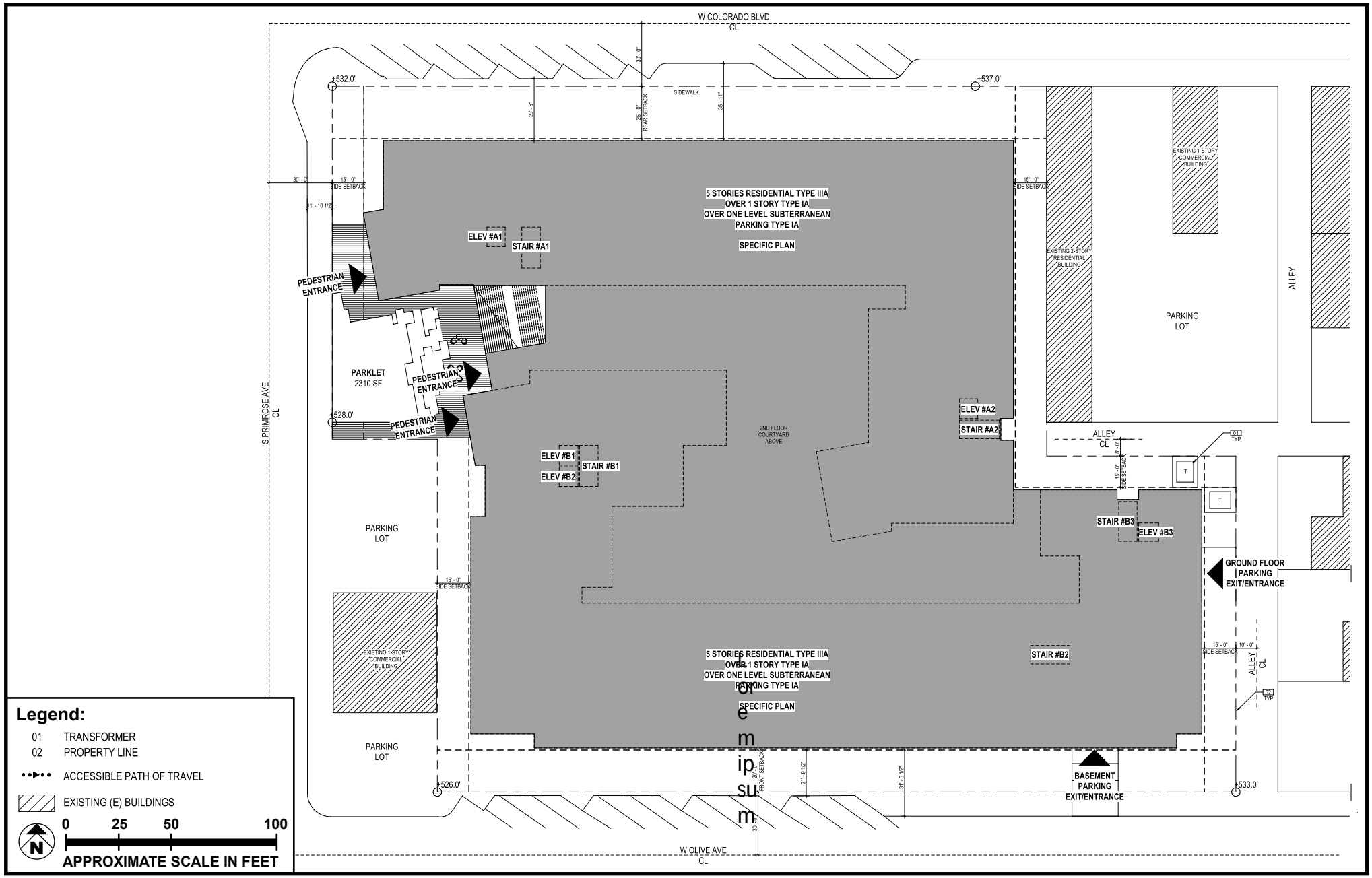

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **3**

Meridian Consultants

Proposed Project Site

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SOURCE: Oak Park Specific Plan - May 2023

FIGURE **4**

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North and East Elevations

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SOURCE: Oak Park Specific Plan - May 2023

FIGURE **5**

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South and West Elevations

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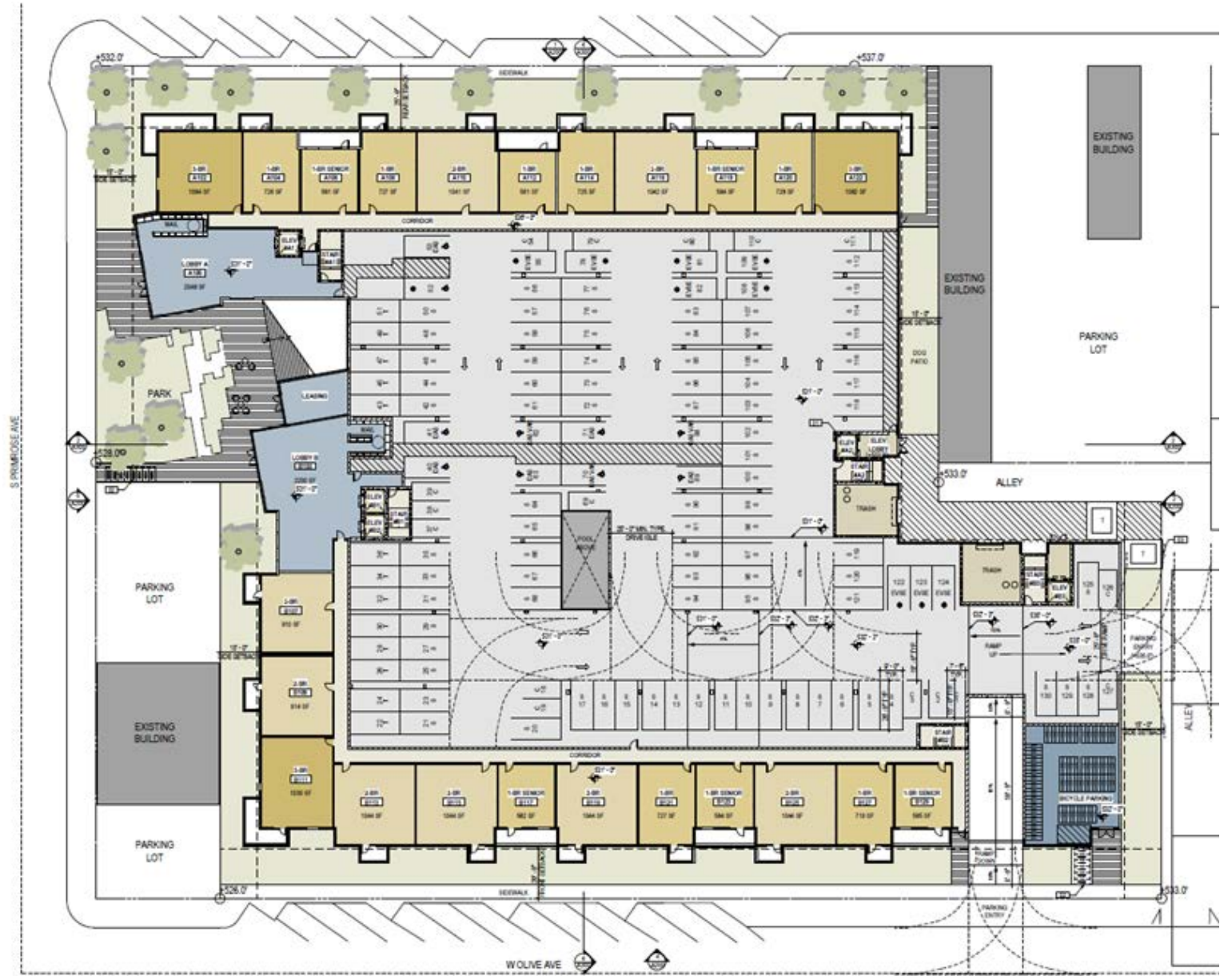

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **6**

Meridian Consultants

First Floor Plan

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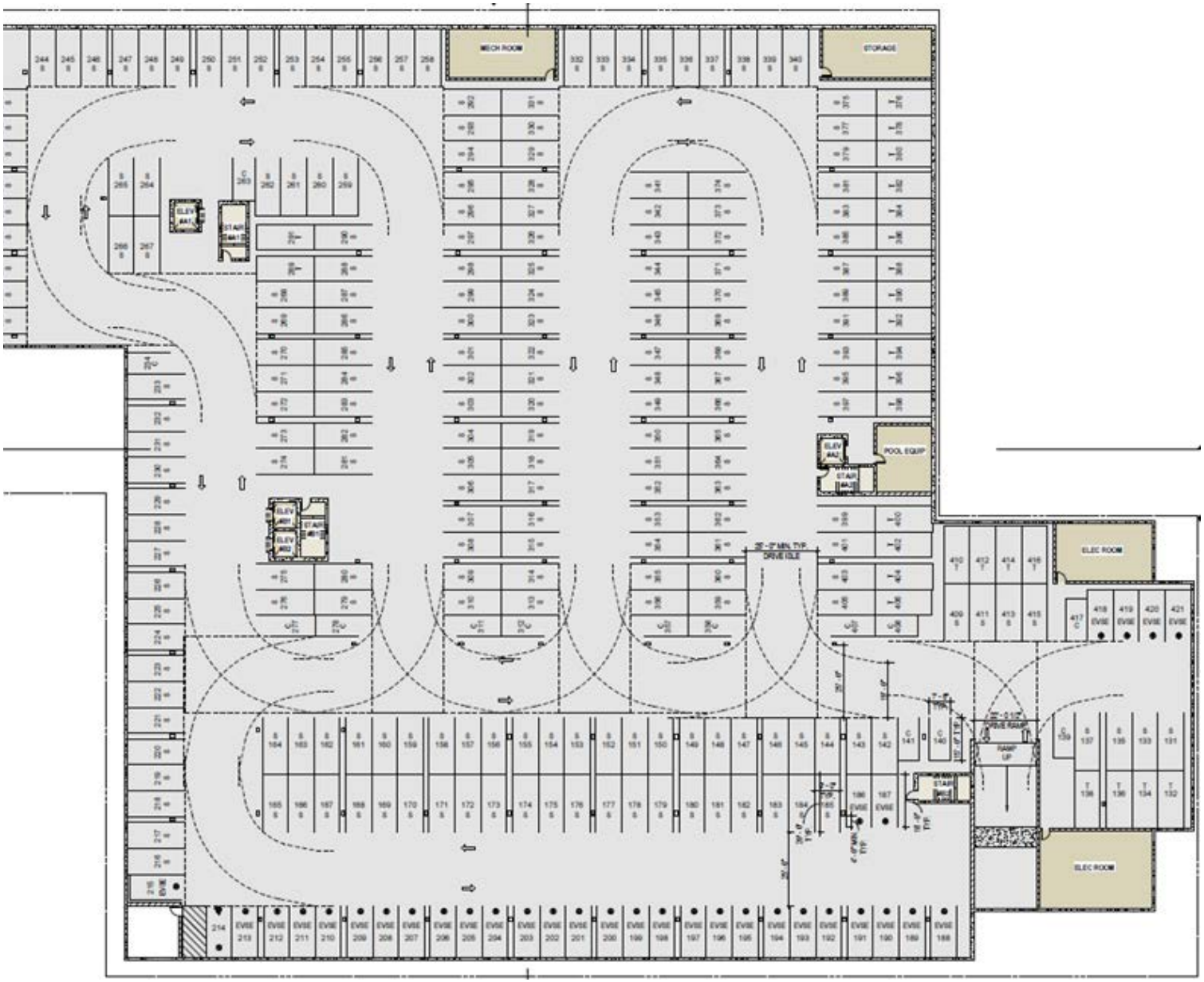

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **7**

Meridian Consultants

Second Floor Plan

374-001-23

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **8**

Meridian Consultants

Third Floor Plan

374-001-23

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **9**

Meridian Consultants

Fourth Floor Plan

374-001-23

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **10**

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Fifth Floor Plan

374-001-23

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **11**

Meridian Consultants

Sixth Floor Plan

374-001-23

An interior courtyard on the second level of the building features a pool, lounge area, playground, greenery, and outdoor recreational space between residential units.

Two terraces are provided on the fifth floor of the building. One designed as an outdoor gathering area and one designed as a garden terrace providing a quieter outdoor lounge area.

Access

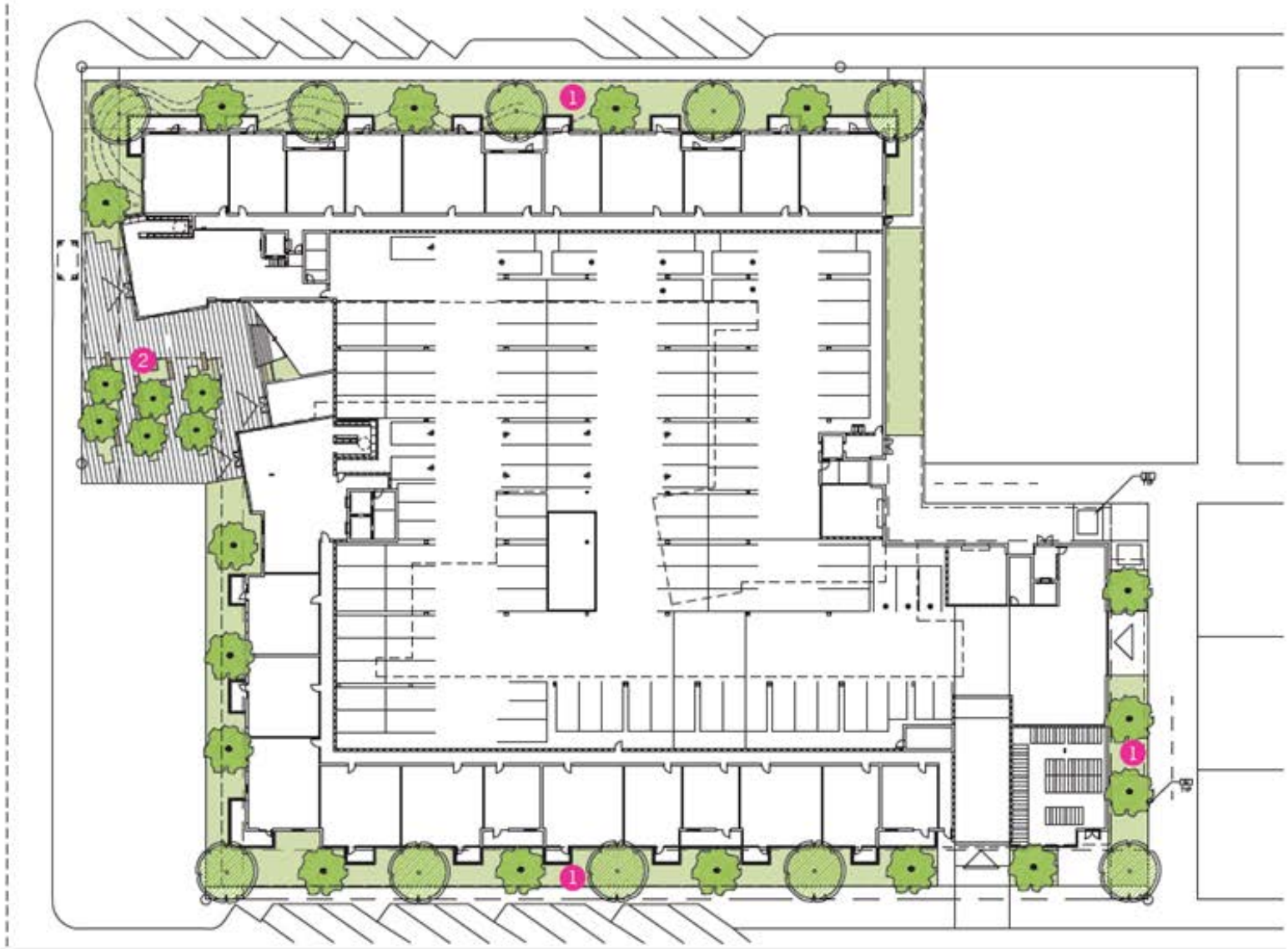
Two new full-access gate-controlled driveways are proposed. A driveway with one inbound lane and one outbound lane is proposed on Olive Avenue to provide access to the subterranean parking level.

A second driveway is proposed on Falling Leaf Alley on the east end of the Project Site, accessible from both Olive Avenue and Colorado Boulevard, to provide access to the ground level parking area. This driveway is proposed to have one inbound lane and one outbound lane. Parking is proposed to be restricted along Falling Leaf Alley, adjacent to the Project, to facilitate circulation to and from this driveway serving the ground level parking area.

No changes to the existing parking on Olive Avenue, Colorado Boulevard and Primrose Avenue or street improvements adjacent to the Project Site, including the bus stop on Primrose Avenue as described above in Section 2.1.3 are proposed.

Parking

The Project includes a total of 421 parking spaces for residents on the ground level of the building and a single subterranean level. Of the total 421 spaces planned, 10% will be electric vehicle (EV) installed and 30% will be EV ready, 299 would be standard parking spaces, 30 would be compact spaces, 11 would be handicapped accessible, 39 would be tandem parking spaces 42 would have EV chargers installed.



SOURCE: Oak Park Specific Plan - May 2023

FIGURE **12**

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Level 1 Landscape Plan

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1 Grand steps to courtyard level

2 Planting concept

3 Bench concept

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **13**

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Level 1 Pocket Pack

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SOURCE: Oak Park Specific Plan - May 2023

FIGURE **14**

Meridian Consultants

Level 2 Courtyard Plan

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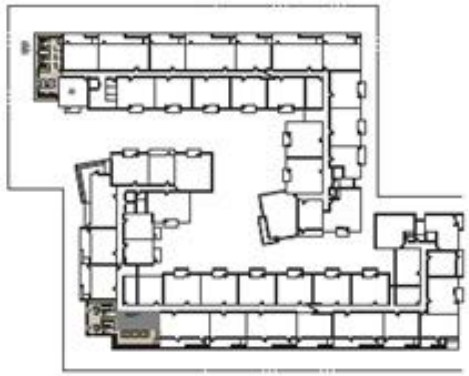
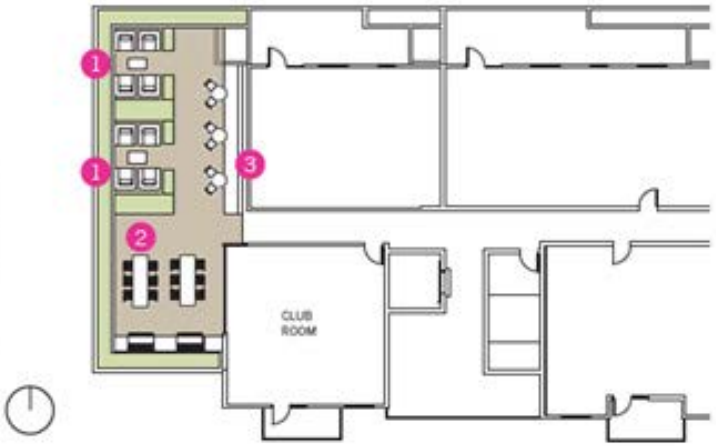
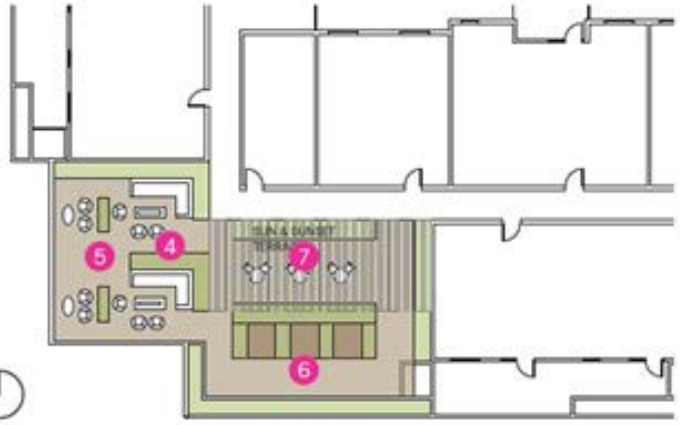




1. Seating niche
2. Barbecue and dining area
3. Banquette seating
4. Seating niche with fireplace
5. Seating with views
6. Built in sun lounger
7. Trellis

Event Terrace



Garden Terrace

N

SOURCE: Oak Park Specific Plan - May 2023

FIGURE **15**

Meridian Consultants

Level 5 Terraces Plan

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Transit Service

Bus service is provided by two existing bus lines operated by Foothill Transit (FT). FT Line 270 is a local north/south line that provides service from Monrovia to El Monte that primarily travels along Foothill Boulevard, Primrose Avenue, Chestnut Avenue, Magnolia Avenue, Huntington Drive, and Myrtle Avenue. A bus stop for FT Line 270 is located on Primrose Avenue adjacent to the site. This bus stop will not be affected by the development of the new multifamily building. FT Line 187 is a local east/west line that provides service from Pasadena to Azusa that primarily travels along Huntington Drive. The Metro A Line station is located approximately 0.85 miles south of the Project Site at the intersection of Myrtle Road and Duarte Road.

Utilities

Water service to the Project Site is provided by the City of Monrovia Community Services Department – Public Works Division. There is a 12-inch main in Colorado Boulevard, an 8-inch main in Primrose Avenue, an 8-inch main in Olive Avenue, and a 2-inch main in Falling Leaf Alley. An existing 4-inch main running east/west through the Project Site would be relocated within the site to accommodate the proposed building.

The City of Monrovia owns, operates, and maintains the sanitary sewer collection system in the City. There is an existing 6-inch sewer line in Falling Leaf Alley that provides service to the Project Site. An existing sewer line running east/west through the site to the line in Falling Leaf Alley would be relocated within the site to accommodate the proposed building.

Construction

Construction will occur over approximately 32 months beginning in January 2025 and ending in August 2027 as shown in Table 1, Construction Schedule. Demolition of the existing buildings would occur over approximately three months, followed by grading and excavation over approximately three months, construction of the new building over approximately 26 months, and site improvements over approximately three months. Construction-related activities would typically occur Monday through Friday, between 7 AM and 7 PM.

Demolition of the existing apartment buildings and parking structures would generate approximately 130,000 SF of material. The amount of soil to be exported would be approximately 57,000 cubic yards (CY) to accommodate site grading, excavation for the subterranean parking level, and the building foundation. It is expected that landfill materials would be hauled to the nearest landfill location at NuWay Landfill in Irwindale. The entirety of the existing site would be modified as a result of the Project.

TABLE 1
CONSTRUCTION SCHEDULE

Activity	Start Date	End Date
Construction	January 2025	August 2027
Demolition	January 2025	March 2025
Grading/Excavation	April 2025	June 2025
Building Construction	July 2025	August 2027
Paving/Site Improvements	June 2027	August 2027

2.3 PROJECT APPROVALS/PERMITTING AGENCIES

Development of the proposed Project would require approval of the following discretionary actions by the City of Monrovia:

- A General Plan Amendment to change the land use designation for the site from Residential High to Planned Development.
- A Zone Change from Residential High to Oak Park Monrovia Specific Plan.
- Approval of the Oak Park Monrovia Specific Plan.
- Density Bonus Approval for additional density under state Density Bonus Law (California Government Code Sections 65915 – 65918) based on the percentage of the Very Low Income and Low Income units being provided.
- A Conditional Use Permit for new construction to allow construction of a multifamily residential project containing more than 2 units.
- A Tentative Parcel Map to combine the two existing parcels into a single parcel.

2.4 OTHER MINISTERIAL CITY ACTIONS

Ministerial permits/approvals would be issued by the City or other appropriate agency to allow site preparations, curb cuts (if necessary), connections to the utility infrastructure, and other Project features subject to ministerial permits.

3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

3.2 DETERMINATION

On the basis of this initial evaluation:

☐	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☒	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Lead Agency Signature

Date

Printed Name

4.0 EVALUATION OF ENVIRONMENTAL IMPACT

4.1 Aesthetics

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐

Potentially Significant Impact: Visual resources identified in the General Plan include the San Gabriel Mountains, located approximately two miles north of the City. Municipal Code Section 17.12.010 provides development standards for view preservation; however, these are applicable only to hillside areas, specifically identified as the Residential Foothill Zone, where views are more pronounced due to topography. The Project is not located within the Residential Foothill Zone and these standards do not apply for this reason.

Public corridors near the Project Site, such as Primrose Avenue, do provide distant views of the San Gabriel Mountains. These views, however, are partially obstructed by intervening buildings, street trees, and topography.

The Project Site is currently developed with two 3-story buildings in the City's downtown and is located immediately south of the taller 4-story Colorado Commons multifamily complex.

Construction of the proposed Project would involve demolition of the existing buildings, parking structures and site improvements, site preparation, grading and excavation, and construction of the new building. Construction activities would be visible from Colorado Boulevard, Primrose and Olive Avenues, and surrounding areas. In addition, construction equipment is not of sufficient height or mass to substantially block views of distant scenic vistas. Any partial obstruction of scenic views of the San Gabriel Mountains as a result of construction activities would be short-term in nature. Therefore, construction impacts related to adverse effects on a scenic vista would be less than significant.

The 3-story buildings on the Project Site would be replaced by the proposed 6-story building. The proposed Project would be greater in height than the existing buildings on and near the Project Site and may affect available scenic vistas.

Further analysis is needed to determine the significance of any effects from the proposed Project on the existing visual character of the Project Site and the surrounding area.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒

No Impact: There are no designated State scenic highways, eligible State scenic highways without official designation within the City of Monrovia. The California Department of Transportation (Caltrans) Landscape Architecture Program administers the Scenic Highway Program, contained in Streets and Highways Code Sections 260–263. State highways are classified as either Officially Listed or Eligible. The portion of Route 39 located approximately 5.37 miles east of the Project Site is identified as an Eligible State Scenic Highway but is not officially designated as a scenic highway by Caltrans.[1]

The Project Site is currently developed with two multifamily residential buildings, parking structures, surface parking lots and ornamental landscaping, and does not contain any scenic resources, such as native trees, rock outcroppings or historic buildings.

Therefore, the proposed Project does not have the potential to damage resources within a State-designated scenic highway.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. In nonurbanized areas, substantially degrade the existing visual character or quality 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?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is developed and located in an urbanized area. The Proposed Project will result in changes to the existing visual character of the site and the surrounding area.

Construction of the proposed Project would involve demolition of the existing buildings, parking structures and site improvements, site preparation, grading and excavation, and construction

[1] California Department of Transportation (Caltrans), State Scenic Highways Map, accessed June 2023, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

of the new building. Construction activities would be visible from Colorado Boulevard, Primrose and Olive Avenues, and surrounding areas.

The two 3-story buildings on the Project Site would be replaced by the proposed 6-story building, with perimeter landscaping, including a proposed public parklet on Primrose Avenue. The proposed Project would be greater in height than the existing buildings on and near the Project Site and would change the visual character of the area.

The Project includes a General Plan Amendment and a zone change. The General Plan Amendment would change the Land Use Designation to Planned Development. The zone change would change the zoning to a Planned Development/Specific Plan designation for the Oak Park Specific Plan. The Planned Development/Specific Plan would define development standards including density, floor area, and unit size for the Project Site. These amendments are requested to increase the allowable density on the Project Site from the existing Residential High (RH) designation, which allows 54 units to per acre and 75% or 0.75 FAR, to a Planned Development/Specific Plan designation, which would allow 99.6 units per acre with a 2.54 FAR., resulting in six story building. The amendments would allow a reduction in the building setbacks on the front and sides of the property and would eliminate the required setback for the second story.

Further analysis is needed to determine the significance of these changes to the visual character of the site and the surrounding area.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Potentially Significant Impact: Existing sources of light in the area include lighting associated with the two existing buildings and the parking structures on the Project Site and surrounding uses.

Spill light occurs when lighting standards, such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting, are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. The spillover of light onto adjacent properties has the potential to interfere with certain activities, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. Light-sensitive uses include residential, some commercial and institutional uses, and, in some situations, natural areas. Changes in nighttime lighting may become significant if a proposed

Project substantially increases ambient lighting conditions beyond its property line and Project lighting routinely spills over into adjacent light-sensitive land uses areas.

The City's Municipal Code Section 17.32.080 states the following, "lighting where provided to illuminate private property shall be so arranged as to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment."

Reflective light (glare) is the result of sunlight or artificial light reflecting from finished surfaces (e.g., window glass) or other reflective materials. Glass and other materials can have many different reflectance characteristics. Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. Reflective light is common in urban areas. Glare generally does not result in the illumination of off-site locations but results in a visible source of light viewable from a distance.

The City's Municipal Code Section 17.32.090 states the following, "no direct or reflected glare, whether produced by floodlight, high temperature processes such as combustion or welding, or other processes, so as to be visible from the boundary line of property on which the same is produced, shall be permitted. Sky-reflected glare from buildings or game courts shall be so controlled by such reasonable means as are practical to the end that the sky-reflected glare will not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs."

The new multifamily residential building, designed to conform to the requirements in the City's Municipal Code, would replace the existing buildings and existing sources of light on the site. The proposed Project would adhere to applicable City policies and regulations, including requiring shielding of lighting fixtures to prevent spillover onto surrounding properties. The building design incorporates non-reflective materials, including brick on the ground level, cement plaster on the middle floors, and wood on the upper floors that step back from the edge of the building. Non-reflective glass would also be used.

Because the proposed Project would have a height of six stories, an increase of three stories from the existing buildings on the site, there is a potential for increased nighttime light and glare conditions when compared to existing conditions and further analysis is needed to determine the significance of these changes to the visual character of the site and the surrounding area.

4.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒

No Impact: The Project Site is designated as Urban and Built-Up Land on the 2018 Important Farmland Map prepared by the California Department of Conservation, Farmland Mapping and Monitoring Program is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[2] The surrounding area is also developed with residential and commercial uses and designated as Urban and Built-Up Land. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide important on, or immediately adjacent to, the Project Site.

Therefore, the proposed Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a nonagricultural use.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

No Impact: The Project Site is zoned Residential High. The Project Site is fully developed and contains existing multifamily residential buildings. The Project Site is not used for agricultural production, not zoned for agricultural use, and is not protected by, or eligible for, a Williamson Act contract. As a result, the proposed Project would not conflict with agricultural zoning or a Williamson Act contract.

2 California Department of Conservation (DOC), Division of Land Resource Protection, California Important Farmland Finder (2018), interactive map, accessed February 2023, https://maps.conservation.ca.gov/dlrp/ciff/.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

No Impact: As defined by the Public Resources Code Section 12220(g),[3] forestland is land that can support 10 percent native tree cover of any species under natural conditions and that allows for management of one or more forest resources. A Timberland Production Zone is defined by the Government Code Section 51104(g)[4] as an area that is zoned for the sole purpose of growing and harvesting timber.

The City of Monrovia has an Angeles National Forest zoning classification, which is applied to all property within the City that is also within the boundary of the Angeles National Forest. This zone is located in the northern portion of the City. As previously stated, the Project Site currently has a zoning designation of Residential High, is developed and surrounded by existing development in downtown Monrovia. The Project Site is not used for timberland production, not zoned as forest land or timberland, and does not contain forest land or timberland. Therefore, no impacts to zoning of forestland, timberland, or timberland zoned timberland production would occur due to the proposed Project.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
d. Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒

No Impact: The Project Site is not defined as having forestland as defined in Public Resources Code Section 12220(g). Additionally, there is no forestland located in or near the Project Site. The proposed Project would not result in the loss of forestland or result in the conversion of forestland to non-forest uses.

3 Public Resources Code (PRC), sec. 12220(g).
4 PRC, sec. 51104(g).

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to non-forest use?	☐	☐	☐	☒

No Impact: The entirety of the Project Site is designated as Urban and Built-Up Land on the 2018 Important Farmland Map prepared by the California Department of Conservation, Farmland Mapping and Monitoring Program.[5] The land immediately surrounding the Project Site in all directions is also designated as Urban and Built-Up Land. There is no Farmland or forestland on the Project Site.

As the proposed Project involves the replacement of existing multifamily residential development with newly constructed multifamily residential development, no changes to the existing environment resulting from the proposed Project would result in the conversion of agricultural or forest lands to nonagricultural or non-forest use.

5 California Department of Conservation (DOC), Division of Land Resource Protection, California Important Farmland Finder (2018), interactive map, accessed February 2023, https://maps.conservation.ca.gov/dlrp/ciff/.

4.3 Air Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management 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?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is located within the City of Monrovia, which is located in the South Coast Air Basin (Basin). Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD and the Southern California Association of Governments (SCAG) adopted the 2022 Air Quality Management Plan (2022 AQMP) in December 2022.

The main purpose of the Air Quality Management Plan (AQMP) is to describe air pollution control strategies to be taken in areas classified as nonattainment areas in relation to federal air quality standards. A nonattainment area is considered to have worse air quality than the National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS), as defined in the federal Clean Air Act. The Basin is in nonattainment for the federal and State standards for ozone (O3), and particulate matter less than 2.5 microns in diameter (PM2.5). In addition, the Basin is in nonattainment for the State particulate matter less than 10 microns in diameter (PM10) standard, and in attainment/maintenance for the federal PM10, carbon monoxide (CO), and nitrogen dioxide (NO2) standards.

A proposed project is consistent with the 2022 AQMP if the project is consistent with the goals, objectives, and assumptions in the plan to achieve the federal and State air quality standards. Furthermore, for the proposed Project to be consistent with the AQMP, the pollutants emitted from the Project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality. Additionally, if feasible mitigation measures are implemented and are shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP.

Further analysis is needed to determine the consistency of the proposed Project with the 2022 AQMP, including quantifying the emissions that would be generated by construction and operation of the proposed Project and reviewing these emissions in relation to SCAQMD significance thresholds.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
b. 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?	☒	☐	☐	☐

Potentially Significant Impact: Construction and operation of the proposed Project would result in the generation of air emissions. The Air Basin is currently in nonattainment of federal air quality standards for 8-hour ozone and particulate matter (PM2.5, PM10); unclassified for the federal sulfur dioxide standard; in nonattainment of State ozone, PM2.5, and PM10 standards; and unclassified for State hydrogen sulfide and visibility-reducing particles standards. Trenching, paving, and other activities associated with the construction of the proposed Project have the potential to emit diesel particulates typical of construction activity. Ongoing operations at the Project Site also have the potential to increase the emission of the specific pollutants mentioned above, including those for which the Air Basin is already in nonattainment of federal and state air quality standards. Implementation of the proposed Project could potentially contribute to air quality impacts that may also be cumulatively considerable with other related projects.

Further analysis is needed to quantify the emissions that would be generated by construction and operation of the proposed Project and reviewing these emissions in relation to SCAQMD significance thresholds.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐

Potentially Significant Impact: There are existing residential uses surrounding the Project Site that could be sensitive to pollutant concentrations. Construction of the proposed Project would generate air emissions. The potential concentrations of these emissions have not been determined at this time.

Further analysis is needed to determine the potential for the proposed Project to generate concentrations of pollutants that could affect sensitive receptors around the Project Site.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Potentially Significant Impact: There are existing residential uses surrounding the Project Site that could be sensitive to odors. Construction of the proposed Project has the potential to expose sensitive receptors to odors associated with construction. The proposed residential uses do not represent a significant source of odors or other emissions with the potential to affect residents located near the Project Site.

However, further analysis is needed to determine the potential for construction of the proposed Project to generate odors that could adversely affect existing uses around the site and significance of any effects.

4.4 Biological Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	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 US Fish and Wildlife Service?	☐	☐	☒	☐

Less than Significant Impact: The Project Site contains an existing apartment complex and is located within an urbanized area within the City of Monrovia. There are no known sensitive species or habitats on site as identified on local/regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS). The existing apartment complex on the site contains ornamental landscaping, including various species of ornamental trees along the edges of the Project Site with some ornamental shrubs and groundcover species and turf and ornamental trees in the central courtyard areas between the two buildings. This ornamental landscaping has limited value as habitat for wildlife.

Existing ornamental landscaping includes trees along the perimeter of the Project Site and in the interior courtyard. Existing ornamental landscaping also includes interior courtyard grass and planters with bushes and shrubs. The new proposed ornamental landscaping would include drought-tolerant and native plant materials. Trees, flowers, and shrubs would be located along the perimeter of the property along Olive Avenue, Primrose Avenue, Colorado Boulevard, and Falling Leaf Alley. A new parklet with trees, flowers, and shrubs would be located along Primrose Avenue and additional landscaping located in the interior courtyard. Based on the above, the proposed Project would not have any substantial direct or indirect effects on sensitive species and impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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 US Fish and Wildlife Service?	☐	☐	☐	☒

No Impact: The Project Site contains an existing apartment complex and is surrounded by other existing urban developments in downtown Monrovia. Neither the Project Site nor the surrounding area contains any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. As a result, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Have a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

No Impact: Neither the Project Site nor the surrounding area contains any wetlands protected under federal law that could be affected by the proposed redevelopment of the Project Site. The proposed Project would have no impact.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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?	☐	☐	☐	☒

No Impact: The Project Site is located in an urbanized area of the City of Monrovia developed with residential and commercial uses. Within the vicinity of the Project Site, there are no large areas of natural habitat that would facilitate wildlife movement to serve as a wildlife corridor. The Project Site is not located in or near to any established wildlife corridor and would not interfere with the movement of any native resident or migratory fish wildlife species or impede the use of native wildlife nursery sites. Therefore, no impacts would occur.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site contains an oak tree located just north of the surface parking lot within the southern portion of the Project Site adjacent to Olive Avenue. Removal of this tree is proposed as part of the Project. All development in the City is subject to Monrovia's Oak Tree Preservation Ordinance (Municipal Code Section 17.20.040). The City's ordinance applies to all native California Live Oak (Quercus Agrifolia) and any other trees of the oak family.

Further analysis is needed to determine potential impacts related to the proposed removal of this oak tree and the consistency of the Project with the City's Oak Tree Preservation Ordinance.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

No Impact: The City, including the Project Site and surrounding areas are not located within the boundaries of a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other local or regional conservation plan. Therefore, implementation of the proposed Project would not conflict with the provisions of any adopted HCP or NCCP, or other approved local, regional, or State HCP. No impacts would occur.

4.5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site contains an existing apartment complex. No historic resources have been previously identified on the site. The existing buildings on the site are 45 years old, are of a simple utilitarian design, and do not appear to be examples of any defined architectural style that would qualify as a historic resource.

The nearest historic resource, as defined in Public Resources Code Section 5020.1(K), is a single-family dwelling located at 210 West Colorado Boulevard, approximately 0.3 miles west of the Project Site. This property was designated a Historic Landmark by the City in 1999.[6]

Further analysis is needed to determine if the proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site contains an existing apartment complex, related site improvements and parking garages. The proposed six story residential building would include one level of subterranean parking; construction of which would require excavation of the site. The required excavation has the potential to disturb native soils, which creates the potential to encounter any cultural resources that may be present in any undisturbed native soils that may be excavated.

Further analysis, based on a site-specific cultural resource assessment, is needed to determine these changes will result in significant impacts.

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6 City of Monrovia, Historic Context Statement (March 2018), https://www.cityofmonrovia.org/home/showpublisheddocument/15147/636594844097370000, accessed July 2023.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Less than Significant Impact: As stated above, the proposed Project involves excavation to construct a subterranean parking garage. Any buried and undiscovered archaeological remains, including human remains, may be present below ground surface in portions of the Project Site. In the unlikely event that human remains are encountered during Project grading, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to. Construction contractors are required to adhere to the California Code of Regulations (CCR) Section 15064.5(e), Public Resources Code (PRC) Section 5097, and Section 7050.5 of the State's Health and Safety Code. To ensure proper treatment of burials, in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, the law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the Los Angeles County Coroner of the find. The contractor, the Developer, and the Los Angeles County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State's Health and Safety Code. Compliance with these provisions would ensure that any potential impacts to unknown buried human remains would be less than significant by ensuring appropriate examination, treatment, and protection of human remains as required by State law.

4.6 Energy

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐

Potentially Significant Impact: The proposed Project would result in the construction of a new multifamily residential building containing 269 units that would replace the two existing multifamily residential buildings on the site containing 156 units. As the proposed development would include more residential units than are currently present on the site, demand for energy resources, including electricity, natural gas, and fuel for vehicles used by residents and their guests, would increase.

Project construction would consume energy in two general forms: fuel energy consumed by construction vehicles and equipment; and bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Construction of the proposed Project would involve on-site energy demand and consumption related to the use of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. Project construction methods would be typical of current construction practices and would not require the use of more energy intensive machinery or higher than normal volumes of trucks and worker vehicle trips.

The proposed Project would be serviced by Southern California Edison (SCE) for electricity and the Southern California Gas Company (SoCal Gas) for natural gas. Energy use would be typical for multifamily residential units designed in accordance with all relevant provisions of the most recent current standards of Title 24 and CALGreen Code. The proposed Project would be required to include ENERGY STAR-rated appliances, energy-efficient boilers and HVAC systems, water-efficient landscaping and irrigation systems in compliance with the most current Title 24 energy efficiency standards. Maintenance activities during operations, such as landscape maintenance, could involve the use of electric- or gas-powered equipment.

Further analysis is needed to determine the amount of energy required by the proposed Project during construction and operation in relation to the energy use of the current development on the Project Site and compliance of the proposed Project with existing energy standards.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

Potentially Significant Impact: The proposed residential development would meet all applicable energy conservation standards. The City of Monrovia Energy Action Plan (EAP) was adopted by the City in June 2008. The EAP was prepared by the San Gabriel Valley Energy Wise Partnership (SGVEWP), which is comprised of 30 San Gabriel Valley cities, the Southern California Association of Governments (SCAG), and Southern California Edison (SCE). The EAP consists of 21 action items identified as the Monrovia Environmental Accords. The Monrovia Environmental Accords are focused on developing City policies that support sustainability in the fields of energy, waste, urban design, urban nature, transportation, environmental health, and water.

The City's Energy Action Plan[7] is a tool used to identify the sources of emissions in the community, including emissions from energy use, and the necessary steps to reduce emissions. The EAP also establishes citywide energy efficiency targets which represent the City's contribution to the State's effort to reduce GHG emissions. The EAP is focused on developing sustainable City policies and does not identify action items for individual development projects. Therefore, the applicable State plans and policies for renewable energy and energy efficiency include the 2019 Title 24 standards, the 2019 CALGreen Code, CPUC's Strategic Plan, and CEC's 2019 IEPR.

Further analysis is needed to determine the consistency of the proposed Project with applicable state energy standards and the City's EAP.

7 City of Monrovia Energy Action Plan, September 2012, https://www.cityofmonrovia.org/home/showpublisheddocument/25459/637546272886770000, Accessed February 2023.

4.7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

No Impact: As with all of Southern California, the Project Site is located in an area subject to strong ground motion resulting from earthquakes on nearby faults. The Project Site is not located within an established Alquist-Priolo Earthquake Fault Zone for surface fault ruptures. The closest faults to the Project Site are the Sierra Madre and Raymond fault zones, both of which are located approximately located approximately 1 mile north of the Project Site.[8] Therefore, no impact related to the rupture of a known earthquake fault as depicted on the most recent Alquist-Priolo Earthquake Fault Zoning Map are anticipated.

	Potentially Significant Impact	Less than Significant with Project Mitigation	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:				
ii. Strong seismic ground shaking?	☐	☐	☒	☐

Less than Significant Impact: As with all of Southern California, the Project Site is located in an area subject to strong ground motion resulting from earthquakes on nearby faults. The most prominent nearby fault zones include the Sierra Madre and Raymond fault zones, both of which are located approximately located approximately 1 mile north of the Project Site.[9] The Sierra Madre fault zone is an approximately 77.7 mile long complex zone of thrust and reverse faults that generally bounds the base of the San Gabriel Mountains and is estimated to be capable of a moment magnitude (Mw) of 6.5 earthquake. The Raymond fault is a strike slip fault that is

8 Group Delta Consultants Inc., Draft Geotechnical Report, November 14, 2022

9 Group Delta Consultants Inc., Draft Geotechnical Report, November 14, 2022

estimated to be capable of a Mw 6.7 earthquake. As the Project Site is in a seismically active area, seismic ground shaking may occur at the Project Site. A list of faults considered capable of producing significant shaking at the site is provided in **Table 2: Nearby Faults**.

TABLE 2
NEARBY FAULTS

Fault Name	Fault Type	Maximum Magnitude (Mw)*	Approximate Closest Distance to Site (miles)
Sierra Madre	Reverse	6.5	0.93
Raymond	Strike Slip	6.7	0.99
Elysian Park (Upper)	Reverse	6.7	8.07
Verdugo	Reverse	6.8	8.82
San Jose	Strike Slip	6.5	10.50
Elsinore	Strike Slip	7.5	7.52
Hollywood	Strike Slip	6.5	13.30

*Source: Draft Geotechnical Report, Group Delta, November 14, 2022 (**Appendix A**)*

** Fault distances and magnitudes referenced from USGS 2008 National Seismic Hazard Maps – Source Parameters Online Search Tool accessed on 09/06/2018*

The California Building Standards Commission regulates development in California to reduce hazards from earthquakes and other geologic hazards. The proposed Project would be required to adhere to the provisions of the 2019 California Building Code (CBC), which went into effect January 1, 2020, that contains standards to safeguard against major structural failures or loss of life caused by earthquakes and other geologic hazards.[10] As required by the 2019 CBC, the recommendations identified in the geotechnical investigation for the proposed Project would be incorporated into the design and construction of the proposed Project.[11] Compliance with the requirements of the 2019 CBC for structural safety would reduce potential hazards from strong seismic ground shaking to less than significant..

10 California Building Code of Regulations, Title 24, Part 2, https://www.dgs.ca.gov/BSC/Codes, accessed July 2023.

11 Group Delta Consultants Inc., Draft Geotechnical Report, November 14, 2022

	Potentially Significant Impact	Less than Significant with Project Mitigation	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:				
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Less than Significant Impact: Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Typically, liquefaction occurs in areas where there are loose soils and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table. The Project Site is not located within a State Earthquake-Induced Liquefaction Seismic Hazard Zone.[12] Field explorations did not encounter ground water to the maximum depth of 51.5 feet explored. The historical high groundwater level at the site is deeper than 200 feet below ground surface. Therefore, the potential of liquefaction-induced seismic settlement is low.

The proposed Project would be required to adhere to the 2019 CBC, which contains provisions for soil preparation to minimize hazards from other seismic-related ground failures.[13] As required by the 2019 CBC, the recommendations identified in the geotechnical investigation for the proposed Project would be incorporated into the design and construction of the proposed Project to ensure that potential seismic-related ground failure impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	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:				
iv. Landslides?	☐	☐	☐	☒

No Impact: The Safety Element of the General Plan identifies areas susceptible to landslides in Monrovia in Figure 3: Areas Susceptible to Landslides. These areas are generally located in the

12 Group Delta Consultants Inc., Draft Geotechnical Report, November 14, 2022

13 California Building Code of Regulations, Title 24, Part 2, https://www.dgs.ca.gov/BSC/Codes, accessed July 2023.

north of Foothill Boulevard in the hillside portion of the City. The proposed Project is proposed on a flat site and is located more than a mile from the hilly terrain of the San Gabriel Mountains in the northern portion of the City. The Project Site is located in downtown Monrovia, a relatively flat area not located near to any hillside areas subject to landslide risks. Therefore, the Project Site is not subject to potential landslide or slope instability impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less than Significant Impact: During construction of the proposed Project, soil would be exposed and there would be increased potential for soil erosion and siltation compared to the existing developed condition of the Project Site. During storm events, erosion and siltation could occur at an accelerated rate.

The proposed Project would comply with the Construction General Permit and the Los Angeles County MS4 Permit that applies to the City of Monrovia, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan and implementation of construction best management practices (BMPs) to reduce impacts to water quality during construction, including impacts associated with soil erosion and siltation. The SWPPP would incorporate best management practices (BMPs) to ensure that potential water quality impacts during construction from erosion would be reduced to less than significant. Typical construction BMPs would ensure excavation is conducted during dry-weather conditions, water is used for moisture control of exposed soils to prevent wind erosion when temporarily disturbed, coverings for temporary stockpiles, temporary catch basins, and sandbagging.

Low Impact Development (LID) BMPs would include installation of deep drywells, a pretreatment device to filter the stormwater prior to infiltrating, and an additional holding tank with sufficient capacity to contain the amount of runoff that would be generated by the Project. Preparation and implementation of the required SWPPP and Erosion and Sediment Control Plan would reduce the potential for erosion impacts to less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

Less than Significant Impact: As discussed above, landslide risks generally occur within mountainous or hilly terrain where steep slopes are present. The Safety Element of the General Plan identifies areas susceptible to landslides in Monrovia in Figure 3: Areas Susceptible to Landslides. These areas are generally located in the north of Foothill Boulevard in the hillside portion of the City. The Project Site is on a flat site and is located more than a mile from the hilly terrain of the San Gabriel Mountains in the northern portion of the City. The Project Site is located in downtown Monrovia, a relatively flat area not located near to any hillside areas subject to landslide risks. Therefore, the Project Site is not subject to potential hazards from landslides or slope instability.[14]

As previously discussed, liquefaction typically occurs in areas where there are loose soils and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table. The Project Site is not located within a State Earthquake-Induced Liquefaction Seismic Hazard Zone.[15] Field explorations did not encounter ground water to the maximum depth of 51.5 feet explored. The historical high groundwater level at the site is deeper than 200 feet below ground surface. Therefore, the potential of liquefaction-induced seismic settlement is low.

Lateral spreading is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction. The Project Site is located in downtown Monrovia, a relatively flat area not located near to any hillside areas subject to landslide risks. The Project Site is not located within a State Earthquake-Induced Liquefaction Seismic Hazard Zone.[16] Therefore, the potential for lateral spreading is low.

Subsidence typically occurs where groundwater, oil, natural gas, or mineral resources are extracted. No previous oil, natural gas or mineral extraction activities have previously occurred on the Project Site. The potential for groundwater extraction-related ground subsidence at the

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Project Site is considered to be limited, given the absence of shallow groundwater in the exploratory borings, down to 51.5 feet below ground surface (bgs). Therefore, the potential for subsidence is low.

Collapsible soils are generally defined as soils that have potential to suddenly decrease in volume upon increase in moisture content even without an increase in external loads. Soil collapse occurs when soils undergo a rearrangement of their grains and a loss of cementation, resulting in substantial and rapid settlement under relatively low loads. The soils encountered below depths of 10 feet below grade were medium dense to very dense. According to the geotechnical investigation, two collapse tests were conducted and indicate the collapse potential is low.[17]

The proposed Project would be required to adhere to the 2019 CBC which requires that the recommendations in the Geotechnical Investigation for the proposed Project to be incorporated into the design and construction of the proposed Project to mitigate potential impacts to less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐

Less than Significant Impact: Expansive soils are characterized as fine-grained, such as silts and clays, or soils with variable amounts of expansive clay minerals that can change in volume due to changes in water content. Collapsible soils typically occur in recently deposited soils that tend to be drier and more granular.

The Project design will incorporate recommendations in the geotechnical analysis prepared for the Project Site and Project.[18] This investigation determined that soils to a depth of 6 feet below ground surface (bgs), and potentially deeper, contain fill material. The existing fill soils are not suitable to support new foundations and will be removed during excavation for the proposed subterranean parking level, which would reach a depth of 10 feet bgs. The soils encountered below depths of 10 feet bgs were medium dense to very dense. Field explorations did not encounter ground water to the maximum depth of 51.5 feet explored. The historical high groundwater level at the site is deeper than 200 feet below ground surface. Based on the soil expansion index included with the geotechnical investigation, the Project Site has a very

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low potential for soil expansion and potential impacts related to expansive soil would be less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

No Impact: The proposed Project would connect to the public sewer system adjacent to the site. The proposed Project does not include the proposed construction of, or connections to, septic tanks or alternative wastewater disposal systems. Accordingly, the proposed Project would not result in impacts related to alternative wastewater disposal systems.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is currently developed with multifamily residential buildings, related site improvements and parking garages and does not contain any unique geologic features. The proposed six story residential building would include one level of subterranean parking; construction of which would require excavation of the site. The required excavation has the potential to disturb native soils, which creates the potential to encounter any paleontological resources that may be present in any undisturbed native soils that may be excavated. Further analysis, based on a site-specific assessment of paleontological resources, is needed to determine the potential for impacts to paleontological resources.

4.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Project Mitigation	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?	☒	☐	☐	☐

Potentially Significant Impact: The proposed Project would include the development of up to 269 residential units, an increase of 113 units from the 156 units currently on the property. Construction and operation of the proposed Project would create greenhouse gas emissions.

Further analysis is needed, including development of a quantified estimate of greenhouse gas emissions (GHG) emissions from the construction and occupancy and use of the proposed Project using the SCAQMD CalEEMod land use emissions computer model to determine the significance of these emissions.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Potentially Significant Impact: The City of Monrovia has adopted an Energy Action Plan that addresses reducing GHG emissions in the City. The Southern California Association of Governments (SCAG) has adopted plans that relate to GHG emissions including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Further analysis is needed to determine the consistency of the proposed Project with applicable state, regional and local plans, policies, and regulations, including the City's Energy Action Plan, adopted for the purpose of reducing GHG emissions.

4.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Project Mitigation	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?	☐	☐	☒	☐

Less than Significant Impact: The Project Site is located in the central portion of the City of Monrovia and is surrounded by existing residential, commercial, and office uses. The proposed Project would replace the existing apartment complex on the site with a new multifamily residential building.

Demolition activities associated with the proposed Project may encounter asbestos and lead based paints. Demolition activities would comply with existing government regulations for asbestos, specifically South Coast Air Quality Management District Rule 1403, California Health and Safety Code Section 39650, California Code of Regulations Title 8 Section 1529, and Code of Federal Regulations Title 40, Part 61 and Part 763, and Title 29, Part 1926. Demolition activities would also comply with existing government regulations for lead based paint, specifically South Coast Air Quality Management District Rule 1420, California Code of Regulations Title 8, Section 1532.1 and Title 17, Sections 35001–36100, and Code of Federal Regulations Title 29, Part 1926. Through compliance with these existing applicable regulations, the potential for the release of hazardous materials during Project demolition activities is less than significant.

Construction activities associated with the proposed Project would involve the use of a limited amount of hazardous and flammable substances/oils (e.g., fuels, lubricants, and solvents) typical during heavy equipment operation for site grading and construction. The amount of hazardous chemicals present during construction is limited and would be in compliance with existing government regulations, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the California Code of Regulations (Title 22). The potential for the release of hazardous materials during Project construction is low and, even if a release would occur, any such release would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials associated with construction vehicles.

The existing and proposed residential use involves the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, fertilizers, and pesticides. For example, landscaping and maintenance activities could include the use of fertilizers and light equipment (e.g., edgers) that may require fuel. These types of activities do not involve the use of a large or substantial amount of hazardous materials. In addition, any such materials would

be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

Less than Significant Impact: As discussed above, construction of the proposed residential buildings, which includes demolition, grading/excavation, and construction of the proposed building and site improvements, would involve the transport, use, and disposal of hazardous materials typically associated with grading and construction of site improvements. Demolition of the existing apartment buildings and parking structures would generate approximately 130,000 SF of material. The amount of soil to be exported would be approximately 57,000 cubic yards (CY) to accommodate site grading, excavation, and necessary foundations. It is expected that landfill materials would be hauled to the nearest landfill location at NuWay Landfill in Irwindale. Demolition activities associated with the proposed Project may encounter asbestos and lead based paints. Demolition activities would comply with existing government regulations for asbestos, such as South Coast Air Quality Management District's Rule 1403, California Health and Safety Code Section 39650, California Code of Regulations Title 8 Section 1529, and Code of Federal Regulations Title 40, Part 61 and Part 763, and Title 29, Part 1926. Demolition activities would also comply with existing government regulations for lead based paint, such as South Coast Air Quality Management District's Rule 1420, California Code of Regulations Title 8, Section 1532.1 and Title 17, Sections 35001–36100, and Code of Federal Regulations Title 29, Part 1926. Through regulatory compliance, the potential for the release of hazardous materials during Project demolition activities is low and, even if a release would occur, any such release would not result in a significant hazard to the public, surrounding land uses, or environment. All hazardous materials would be properly handled and stored per manufacturer instructions and subject to applicable health and safety requirements. Compliance with existing laws, regulations, plans, and programs would reduce the potential for foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction to less than significant.

As previously discussed, the operation of the proposed residential use would involve the use and storage of small quantities of potentially hazardous materials. These types of activities do

not involve the use of a large or substantial amount of hazardous materials. Any such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. It is not expected that implementation of proposed Project would create a significant hazard to the public or environment.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

No Impact: There are no existing or proposed schools within one-quarter mile of the Project Site. The nearest school is Monroe Elementary, located at 402 W. Colorado Boulevard, approximately 0.3 miles to the west of the Project Site. Demolition activities associated with the proposed Project may involve handling asbestos and lead based paints that may be present in the existing buildings. Through compliance with existing regulations, the potential for the release of hazardous materials during Project demolition activities is low and, even if a release would occur, any such release would not result in a significant hazard to the public, surrounding land uses, or environment. The construction of the proposed residential community would involve the transport, use, and disposal of hazardous materials typically associated with grading and construction of site improvements and homes in accordance with City regulation. The proposed residential uses would not involve the handling of hazardous substances or emit hazardous emissions. As a result, potential impacts are less than significant as the proposed Project would not involve the handling of hazardous substances or emit hazardous emissions within one-quarter mile of an existing or proposed school.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

No Impact: Significant impacts could occur if the Project Site were included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on database review, the Project Site is not included on any of these hazardous materials site lists included in the Department of Toxic Substances Control's EnviroStor database, which includes CORTESE sites and the Environmental Protection Agency's database of regulated facilities or other lists compiled pursuant to Government code section 65962.5.[19]

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
e. For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒

No Impact: The nearest airport to the Project Site is the San Gabriel Valley Airport located approximately 4 miles to the southwest. The Project Site is not located within the San Gabriel Valley Airport noise contours or Airport Land Use Planning Commission (ALUC) responsibility area.[20] As such, the location of the proposed Project would not result in a safety hazard or excessive noise for residents or employees in the Project area.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less than Significant Impact: Any partial closure of these roads would be temporary, would not occur simultaneously, and would be conducted in accordance with a construction management plan and under the supervision of construction personnel. The City identifies emergency evacuation routes in its General Plan Safety Element, none of which are immediately adjacent to the Project Site, and thus would not be impacted by the temporary closure of adjacent streets during Project construction. The nearest evacuation routes to the Project Site are Magnolia Avenue, approximately 0.1 mile to the west, and Ivy Avenue, approximately 0.15 miles

19 California Department of Toxic Substances Control, EnviroStor, accessed February 2023, https://www.envirostor.dtsc.ca.gov/public/.

20 Los Angeles County, Airport Land Use Commission, Airport Land Use Plan (1991) https://case.planning.lacounty.gov/assets/upl/data/pd_alup.pdf, accessed June 2023.

to the east. Based on the above, impacts to adopted emergency response plan or emergency evacuation plans would be less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

No Impact: According to the City of Monrovia General Plan Safety Element, the Project Site and surrounding locations would not be affected by wildfires. Furthermore, the Project Site and surrounding locations are not in a Fire Hazard Severity Zone.[21] The Project Site is located in an urban, developed area within the City and is surrounded by commercial and residential uses. No wildlands occur within or near the Project Site. As a result, no impacts related to wildland fires would occur.

21 Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/, accessed February 2023.

4.10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise degrade surface or ground water quality?	☐	☐	☒	☐

Less than Significant Impact: Pollutants of concern during Project construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled, leaked or transported via storm runoff into adjacent drainages and into downstream receiving waters.

Construction activities associated with the proposed Project would disturb approximately 2.7 acres of soil. Projects that disturb greater than 1 acre of soil are required to comply with the State Water Resources Control Board (SWRCB) Construction General Permit. The Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs). Additionally, the proposed Project would be required to prepare an Erosion and Sediment Control Plan, which includes elements of a SWPPP, in compliance with the City of Monrovia Municipal Code. Therefore, in compliance with the Construction General Permit and the City of Monrovia Municipal Code, a SWPPP and Erosion and Sediment Control Plan would be prepared and construction BMPs implemented during construction activities. Construction BMPs would include, but not be limited to Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

The proposed Project would replace the existing apartment complex on the Project Site with the new multifamily building. The new building would be required to include Low Impact Development (LID) BMPs features in compliance with the Los Angeles County MS4 Permit and as specified in Title 12, Chapter 12.36, Section 12.36.100 of the City of Monrovia Municipal Code to target pollutants of concern in runoff from the Project Site.

Compliance with the water quality standards in the Los Angeles County MS4 Permit and in Title 12, Chapter 12.36, Section 12.36.100 of the City of Monrovia Municipal Code, along with

preparation and implementation of the required SWPPP and Erosion and Sediment Control Plan, would reduce the potential for erosion impacts to less than significant.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is currently developed with apartment buildings, parking garages, and related site improvements and the existing amount of impervious surfaces limits groundwater recharge on the site. Redevelopment of the Project Site with the proposed multifamily residential building would not, therefore, substantially interfere with groundwater recharge.

The City of Monrovia operates its own water utility, which is managed by the Monrovia Utility Division. All water is obtained from five active wells located in the San Gabriel Groundwater Basin. In 2020, available supplies were estimated at 6,976 acre-feet per year (af/yr) and citywide water demand was estimated at 6,967 af/yr. By 2045, supplies are projected to be 8,282 af/yr, and citywide demand is forecast to be 8,282 af/yr.[22]

The proposed Project would allow the development of up to 269 dwelling units, an increase of 113 units from the 156 units currently on the Project Site, which would increase water demand.

Further analysis of the changes in water demand that would result from the proposed Project and the potential effects on the City's groundwater supplies is needed to determine if these changes will result in significant impacts.

22 City of Monrovia, 2020 Urban Water Management Plan, 2021.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is developed with an existing apartment complex and drains to existing drainage facilities in the streets that border the site. A 69-inch storm drain line is located west of the Project Site under Primrose Avenue, with a catch basin featuring a curb cut opening at the street level. The proposed Project would change the existing drainage pattern, increase the total impervious surfaces on site, and increase the total number of residential dwellings.

Construction of the proposed Project has the potential for erosion and sedimentation impacts during demolition and grading activities. Erosion and sedimentation caused by construction activities are dependent on climatic and site conditions, as well as the degree of soil disturbance during construction. The proposed Project would be required to comply with the Construction General Permit and the Los Angeles County MS4 Permit, which require preparation of a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan and implementation of construction best management practices (BMPs) to reduce impacts to water quality during construction, including impacts associated with soil erosion and siltation. The SWPPP would incorporate best management practices (BMPs) to ensure that potential water quality impacts during construction from erosion would be reduced to less than significant. Typical construction BMPs would ensure excavation is conducted during dry-weather conditions, water is used for moisture control of exposed soils to prevent wind erosion when temporarily disturbed, coverings for temporary stockpiles, temporary catch basins, and sandbagging.

The proposed Project would include drainage facilities that comply with the City's Stormwater Management Regulations (Chapter 12.36 of the Municipal Code) and meet the City's Low Impact Development (LID) standards. As required by City's Low Impact Development (LID) standards, post-construction BMPs to mitigate storm water pollution are required for all new development and redevelopment projects. BMPs must be implemented to retain a Storm Water Quality Design Volume (SWQDv) of: (1) the 0.75 inch, 24-hour rain event; or (2) the 85th percentile, 24-hour event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project's LID BMPs would include installation of deep drywells, a

pretreatment device to filter the stormwater prior to infiltrating, and an additional holding tank with sufficient capacity to contain the amount of runoff that would be generated by the proposed Project.

While the proposed Project would not substantially alter the existing drainage pattern of the Project Site, it would alter the existing drainage characteristics of the Project Site. The proposed Project would comply with the Construction General Permit and the Los Angeles County MS4 Permit, and City's Stormwater Management Regulations City's Low Impact Development standards.

Further analysis of the changes in the drainage characteristics of the site from the proposed Project and the potential effects on erosion or siltation is needed to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

Less than Significant Impact: Construction of the proposed Project would temporarily alter the existing drainage patterns on the Project Site, particularly during excavation and grading activities. Uncontrolled runoff could potentially alter drainage patterns in the area but would not affect off-site natural streams or rivers. The proposed Project would increase to total impervious surfaces on-site and increase the total number of residential dwellings.

The proposed Project would be required to prepare an Erosion and Sediment Control Plan, which includes elements of a SWPPP, in compliance with the City of Monrovia Municipal Code. The proposed Project will include drainage facilities that comply with the City's Stormwater Management Regulations (Chapter 12.36 of the Municipal Code) and meet the City's Low Impact Development (LID) standards. As required by City's Low Impact Development (LID) standards, post-construction BMPs to mitigate storm water pollution are required for all new development and redevelopment projects. BMPs must be implemented to retain a Storm Water Quality Design Volume (SWQDv) of: (1) the 0.75 inch, 24-hour rain event; or (2) the 85th percentile, 24-hour event, as determined from the Los Angeles County 85th percentile

precipitation isohyetal map, whichever is greater. The Project's LID BMPs would include installation of deep drywells, a pretreatment device to filter the stormwater prior to infiltrating, and an additional holding tank with sufficient capacity to contain the amount of runoff that would be generated by the proposed Project.

While the proposed Project would not substantially alter the existing drainage pattern of the Project Site, it would alter the existing drainage characteristics of the Project Site. Through compliance with the State Water Resources Control Board (SWRCB) Construction General Permit and the Los Angeles County MS4 Permit and the City's Stormwater Management Regulations, City's Low Impact Development standards, the rate of surface runoff as a result of proposed Project implementation would not substantially increase.

Further analysis of the changes in the drainage characteristics of the site from the proposed Project and the potential effects on erosion or siltation is needed to determine if these changes will result in significant impacts

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
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;	☒	☐	☐	☐

Potentially Significant Impact: The Project Site is developed with an existing apartment complex and drains to existing drainage facilities in the streets that border the site. A 69-inch storm drain line is located west of the Project Site under Primrose Avenue, with a catch basin featuring a curb cut opening at the street level. The proposed Project would increase to total impervious surfaces on site and increase the total number of residential dwellings.

The proposed Project would be required to prepare an Erosion and Sediment Control Plan, which includes elements of a SWPPP, in compliance with the City of Monrovia Municipal Code. The proposed Project will include drainage facilities that comply with the City's Stormwater Management Regulations (Chapter 12.36 of the Municipal Code) and meet the City's Low Impact Development (LID) standards.

While the proposed Project would not substantially alter the existing drainage pattern of the Project Site, it would alter the existing drainage characteristics of the Project Site and further analysis of these changes is needed to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
iv) Impede or redirect flood flows?	☐	☐	☐	☒

No Impact: The Project Site contains no stream or river features and is not located within an identified floodplain, floodway, or FEMA Flood Zone and would not impede or redirect any flood flows.[23]

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

No Impact: As identified above, the Project Site is not located in an identified floodplain, floodway, or FEMA Flood Zone. The Project Site is also not located in a tsunami or seiche zone.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over 25 miles inland from the Pacific Ocean and is located at a sufficient distance so as not to be subject to inundation by tsunami.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. As the Project Site is not adjacent to any such water body, there would be no risk of direct impacts from a seiche.

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23 City of Monrovia Safety Element, Figure 2, https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/safety-element, accessed June 2023.

There are three facilities upstream of the City of Monrovia, the Sawpit Dam, Sawpit Debris Basin, and Santa Anita Dam which have the potential for failure caused by seismic activity that could result in flooding portions of the City. The Sawpit Dam is a concrete dam located in Sawpit Canyon in the foothills of the San Gabriel Mountains built in 1927 and is owned by the Los Angeles County Department of Public Works. The dam was originally used for flood control and water conservation purposes and had an original capacity of 960 acre feet. At some time since its original construction, a hole was created in the bottom of the dam to allow the stream to flow through the dam. Over time, accumulation of debris and operating restrictions have significantly reduced the reservoir storage capacity. If the dam failed at capacity, most of the flooding would occur in the northeastern area of the City. The Sawpit Debris Basin is located in the foothills in the northern portion of the City of Monrovia, has a capacity of 476 acre-feet. The Santa Anita Dam, which was built in 1927, is located to the northwest of downtown Monrovia and is owned by the Los Angeles County Department of Public Works. This dam has a capacity of 1,376 acre-feet. If the Santa Anita Dam failed at capacity the drainage area required would be 11 square miles. Most of the flooding would occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of the Foothill Freeway. The Project Site is not subject to inundation from failure of any of these facilities[24]. For these reasons, no impacts would result from the proposed project.

The Project Site is not located in a flood hazard, tsunami, or seiche zone, and thus would not be subject to risks related to the release of pollutants due to project inundation.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Less than Significant Impact: As discussed above, the Project Site is located within the jurisdiction of the Los Angeles RWQCB. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) establishes water quality standards for ground and surface waters within the Los Angeles region, which includes the City, and is the basis for the Los Angeles RWQCB's regulatory programs. Chapter 8, Groundwater Quality Management, of the Basin Plan focuses on basin/sub-basin groundwater quality management and includes Salt and Nutrient Management Plans (SNMPs) specific to each basin within the Los Angeles region. Specifically, Section F of the Basin Plan includes the program of implementation based on the Basin's SNMP, which includes existing and planned programs to manage salts and nutrients in the Basin (SNMP management measures). The SNMP management measures (refer to Tables 8.6-

[24] City of Monrovia Safety Element, Figures 4 and 5, November 1, 2022.

4A and Table 8.6-4B of the Basin Plan) developed by local water entities in the San Gabriel Valley Basin are voluntary measures that are designed to maintain water quality that is protective of beneficial uses, while increasing recycled water use and supporting the sustainable use of groundwater. These measures are applied in conjunction with existing water quality protection measures in each groundwater basin area.

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a groundwater sustainability plan. The project site is located within the San Gabriel Valley groundwater basin (Basin), which is designated as a Very Low priority basin.4 Therefore, there is no groundwater sustainability plan established for the Basin.

As discussed above, the proposed Project would not substantially deplete groundwater supplies or interfere with groundwater recharge and would comply with the State Water Resources Control Board (SWRCB) Construction General Permit and the Los Angeles County MS4 Permit and as specified in Title 12, Chapter 12.36, Section 12.36.100 of the City of Monrovia Municipal Code. For these reasons, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Physically divide an established community?	☐	☐	☒	☐

Less than Significant Impact: The Project Site is located in the central portion of the City directly adjacent to Monrovia's historic downtown, located along Myrtle Avenue. The Project Site is bound by Colorado Boulevard to the north, Primrose Avenue to the west, Olive Avenue to the south and Falling Leaf Alley to the east. Uses surrounding the Project Site include restaurants, retail, and other commercial uses along Myrtle Avenue to the east; the Myrtle Olive business park, which includes a variety of commercial uses to the south; a dental office to the immediate west along Primrose Avenue; single-family homes and the Spiritualist Church of Revelation to the west across Primrose Avenue; and existing multifamily residential buildings to the north across Colorado Boulevard.

The Project Site is currently developed with two existing apartment buildings, parking structures and related site improvements and the City's General Plan designates the site for Residential High (RH) uses which would be consistent with the pattern of surrounding land uses. The Oak Park Monrovia Specific Plan is proposed to implement the City's General Plan. Replacement of the existing apartment buildings with the proposed multifamily residential building is consistent with the City's General Plan would not physically divide the established pattern of development around the site.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Cause a significant environmental impact due to a conflict with applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

Potentially Significant Impact: The current General Plan and zoning designations for the Project Site are Residential High. A General Plan amendment to change the designation to Planned Development (PD) and a zone change to Oak Park Monrovia Specific Plan are proposed as part of the proposed Project. Other requested approvals include Density Bonus approval for additional density under state Density Bonus Law (California Government Code Sections 65915 – 65918) based on the percentage of the Very Low Income and Low Income units being provided,

a Conditional Use Permit for new construction to allow construction of a multifamily residential project containing more than 2 units, and a Tentative Parcel Map to combine two existing parcels into a single parcel.

Further analysis is needed to determine the consistency of the proposed General Plan Amendment, Zone Change, Specific Plan, and Conditional Use Permit with the goals, objectives, and policies in the Monrovia General Plan.

4.12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒

No Impact: According to the California Department of Conservation, Division of Mine Reclamation, the City has no active mines.[25] Although there are regional known mineral resources in San Gabriel Valley (including Portland Cement Concrete-Grade Aggregate and sand and gravel resource areas), there are no proposals for new mining operations in the City, and the City has no lands zoned for mining activities.

In 1975, the California Legislature enacted the Surface Mining and Reclamation Act, which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into the following four Mineral Resource Zones (MRZ):

- MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated.
- MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

Of the four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the State of California Mining and Geology Board as being "regionally significant." Such designations require that a Lead Agency's land use decisions involving designated areas be made

25 California Department of Conservation, Division of Mine Reclamation, Mines Online, https://maps.conservation.ca.gov/mol/index.html, accessed on June 19, 2023.

in accordance with its mineral resource management policies and that the importance of mineral resource to the region or the State as a whole be considered.

The Project Site has been classified by the California Department of Mines and Geology as being located in MRZ-4, indicating that the Project Site is located in an area where there is inadequate information to assign the region to any other MRZ Zone.[26] Although the California Department of Mines and Geology classified the Project Site as MRZ-4, there are no mineral resources or mineral resource extraction activities on the Project Site.

As the Project Site consists of developed land and has no known mineral resources on-site, Project implementation would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State.

	Potentially Significant Impact	**Less than Significant with Project Mitigation**	**Less than Significant Impact**	**No Impact**
Would the Project:				
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

No Impact: As discussed above, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. There are no mineral resource areas designated within the City, and there are currently no mines or extraction sites present.

26 California Department of Mines and Geology, Generalized Aggregate Resources Classification Map for the San Gabriel Valley and Adjacent Production-Consumption Regions. 1982.

4.13 Noise

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

Potentially Significant Impact: Construction of the proposed Project, including demolition of the existing structures and site improvements, excavation for the proposed subterranean parking level, and construction of the new building and site improvements would generate noise on a temporary basis. After the site is developed, noise levels generated by the proposed residential uses would be similar to the noise levels generated by the existing residential use on the site and surrounding residential uses. The number of units and residents would increase in comparison to the existing apartment complex on the Project Site as well as the location and configuration of outdoor open space areas, which could affect noise levels.

Further analysis is needed to determine the potential effects of construction noise and the potential for noise from occupancy of the proposed multifamily residential building to affect surrounding uses to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project result in:				
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

Potentially Significant Impact: Construction activities can generate varying degrees of ground vibration depending on the construction procedures and construction equipment used. Residential and other noise sensitive uses located around the Project Site may experience a temporary increase in groundborne vibration and noise. The proposed multifamily residential building would not include any facilities or equipment that could generate excessive groundborne vibration or noise levels.

Further analysis is needed to determine the potential effects of groundborne vibration and noise generated during construction to affect surrounding uses to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project result in:				
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

No Impact: The Project Site is not located within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. The nearest airport to the Project Site is the San Gabriel Valley Airport located approximately 4 miles to the southwest. The Project Site is not located within the San Gabriel Valley Airport noise contours.[27] The proposed Project would not expose people residing in the project area to excessive noise levels from aviation activities.

27 Los Angeles County Airport Land Use Plan (1991).

4.14 Population and Housing

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Induce substantial 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)?	☒	☐	☐	☐

Potentially Significant Impact: The Project proposes development of 269 multifamily units on a site designated for the development of multifamily residential uses by the Monrovia General Plan. The Project Site is located adjacent to the City's historic downtown corridor and is surrounded on all sides by developed land. Due to the urban location of the Project Site, there is existing infrastructure available in the streets bordering the Project Site and, for this reason, the proposed Project would not require the extension or upgrading of roads, water or sewer lines, or other infrastructure that would have the potential to induce additional growth.

The proposed Project involves the construction of a multifamily residential building in the place of the two existing multifamily residential buildings currently on the Project Site. The proposed Project would include more units than are currently present on the Project Site and would result in an increase in population relative to the 239 existing residents.

Further analysis is needed to determine the increase in population that would result from the proposed Project and the consistency of this growth with local and regional growth projections and plans to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☒	☐	☐	☐

Potentially Significant Impact: The Project Site contains an existing apartment complex, including senior and affordable housing units. These senior and affordable units would be replaced in the proposed Project, so the construction of replacement housing elsewhere would not be required. Construction of the proposed Project would, however, require the displacement of the existing residents. A relocation plan for residents of the existing housing units would be included as part of the proposed Project. This plan is regulated by the criteria

for qualifying protected units in SB 330. The existing lower income households and the senior resident units fall into the protected category for relocation as defined by SB 330. Assistance will be provided for temporary relocation of existing residents to allow construction of the Project. The housing needs of existing residents will be considered on an individual basis and could also involve assistance to support permanent relocation.

Further analysis of the proposed relocation plan is needed to determine the effect of the proposed Project on existing residents and the potential need to construct replacement housing elsewhere to determine if these changes will result in significant impacts.

4.15 Public Services

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

Potentially Significant Impact: The proposed Project would include the development of a multifamily residential building containing 269 units, an increase from the number of units currently on the Project Site. The increase in residents that would result from the proposed Project would increase demands for public services.

The Monrovia Fire & Rescue provides 24-hour fire, rescue, and emergency medical services to the City, including the project site. The Monrovia Fire & Rescue also includes a Fire Prevention Division and Hazard Materials Division. The nearest station to the project site is Station 101, located at 141 East Lemon Avenue, approximately 0.3 miles northeast of the project site.

The City of Monrovia Police Department (MPD) provides law enforcement services to the City, including the project site. The nearest MPD station is located approximately 0.4 miles northeast of the project site at 140 E. Lime Avenue. According to the General Plan, the police department is staffed with 49 regular police officers, 34 City-employed support personnel, and 4 volunteer support personnel.

The Project area is served by the Monrovia Unified School District; the district operates one preschool, five elementary schools, two middle schools, one traditional high school, one alternative high school, and one first through twelfth grade independent study school.

The City currently owns and manages 33.3 acres of developed City parks, 80 acres of natural area at Canyon Park, and an additional 1,336 acres of natural lands in the Hillside Wilderness.

The 33.3 acres of developed City parks currently provides 0.90 acres of park space per 1,000 residents. Adding the recreational value of Canyon Park's 80 acres and its proximity to the urban population, the City provides 3.05 acres per 1,000 people of public parkland in its park and open space system. The closest park to the Project Site is Library Park, approximately 0.3 miles north of the Project Site.

Further analysis is needed to determine the need for additional public service facilities as a result of the increase in population that would result from the proposed Project to determine if these changes will result in significant impacts.

4.16 Recreation

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

Potentially Significant Impact: The City currently owns and manages 33.3 acres of developed City parks, 80 acres of natural area at Canyon Park, and an additional 1,336 acres of natural lands in the Hillside Wilderness Preserve. The 33.3 acres of developed City parks currently provides 0.90 acres of park space per 1,000 residents. Adding the recreational value of Canyon Park's 80 acres and its proximity to the urban population, the City provides 3.05 acres per 1,000 people of public parkland in its park and open space system. The closest park is Library Park, approximately 0.3 miles north of the Project Site.

Further analysis is needed to determine the potential for increased use of existing parks and the effects on park facilities to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	☒	☐	☐	☐

Potentially Significant Impact: The proposed Project would include the development of private recreational facilities, including a pool and lounge area, programmable activity lawn, and event spaces, which would assist in meeting the recreational demand created by the addition of new residents to the City.

Further analysis is needed to determine the potential for significant impacts from construction of the proposed on-site recreation facilities and the need to improve existing off-site park facilities.

4.17 Transportation and Traffic

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐

Potentially Significant Impact: The City has adopted plans, ordinances, and policies addressing the performance of the circulation system in the City, including the Circulation Element of Monrovia General Plan. The Circulation Element is required by the State to "consist of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the [General] Plan."[28]

The proposed Project would replace the existing apartment complex on the Project Site with a new multifamily residential building that would increase the number of residential units on the site and amount of traffic generated. Access into and out of the Project Site would also change.

Further analysis is needed to determine the potential for these changes to conflict with plans and policies for the City's circulation system including transit, roadway, bicycle, and pedestrian facilities to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐

Less than Significant Impact: CEQA Guidelines Section 15064.3, subdivision (b) states that land use projects that result in vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. CEQA Guidelines Section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, as is the Proposed Project, should be presumed to cause a less than significant

28 City of Monrovia General Plan, Circulation Element, https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/circulation-element, accessed June 2023.

transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The proposed Project would increase the number of residential units on the Project Site which would result in an increase in VMT. The proposed Project would generate a net increase of 527 daily trips, of which a net total of approximately 47 trips would occur during the morning peak hour and 41 trips during the evening peak hour.

Consistent with the requirements of CEQA Guidelines Section 15064.3, the City of Monrovia has adopted significance criteria for transportation impacts based on vehicle miles traveled for land used development projects. The intent of this threshold is to assess whether a proposed project or plan adequately reduces the vehicle miles traveled per service population for the City of Monrovia. The City has adopted three VMT screening criteria including Transit Priority Area (TPA) Screening, Low VMT Area Screening and Project Type Screening. TPA and Low VMT Area screening was assessed based on the San Gabriel Valley Council of Governments (SGVCOG) VMT Screening Tool.

Based on the SGVCOG VMT Screening Tool, the proposed Project is located within both a TPA and Low VMT Area and satisfies both screening criteria. Therefore, the proposed Project is presumed to have a less than significant impact relative to VMT Metrics. No further analysis is required.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐

Potentially Significant Impact: The proposed Project would change the existing access points for vehicles into the site. The driveways for the existing apartment complex on the Project Site would be relocated as part of the proposed Project.

Vehicular access would be provided by two new gated controlled full-access driveways. The proposed Project driveways would be designed to comply with City of Monrovia standards as outlined in the City of Monrovia Municipal Code Section 17.24.050 Parking Facilities Design – Residential Uses. A driveway located along Olive Avenue would provide vehicular access to the subterranean parking area serving the Project Site. This driveway would have a width of 22 feet, providing one inbound lane and one outbound lane. A second driveway would be located

along Fallen Leaf Alley on the east end of the Project Site, accessible via Olive Avenue and Colorado Boulevard. This would provide access to the ground level parking area, with a width of 26 feet, providing one inbound lane and one outbound lane. Parking would not be allowed along Fallen Leaf Alley in order to provide the required circulation to and from the Project driveway serving the ground level parking area.

The Project driveways would be located as far away as possible from the closest intersection and away from major pedestrian thoroughfares, enhancing walkability and connectivity. The new driveway would not create sharp curves, sight-distance issues or a dangerous intersection. The driveways would be configured to avoid or minimize potential conflicts with pedestrian traffic. Pedestrian access points to the Project site would be located along the Project's Primrose frontages, minimizing pedestrian-vehicle conflicts. The Project design features/physical configurations do not negatively affect the visibility of pedestrians to drivers entering and exiting the site, and the visibility of cars to pedestrians.

Further analysis is needed to determine the potential for the proposed Project to substantially increase hazards due to a geometric design feature or incompatible uses to determine if these changes will result in significant impacts.

	Potentially Significant Impact	**Less than Significant with Project Mitigation**	**Less than Significant Impact**	**No Impact**
Would the Project:				
d. Result in inadequate emergency access?	☒	☐	☐	☐

Less than Significant Impact: The proposed Project would change the existing access points for vehicles into the site. The driveways for the existing apartment complex on the Project Site would be relocated as part of the proposed Project. Vehicular access would be provided by two new gated controlled full-access driveways. The proposed Project driveways would be designed to comply with City of Monrovia standards as outlined in the City of Monrovia Municipal Code Section 17.24.050 Parking Facilities Design – Residential Uses. The proposed Project would not alter the roadway system. A Construction Traffic Management Plan will be prepared and implemented as part of Project to ensure adequate emergency access. The proposed Project would not disrupt emergency access roadways. The proposed Project is accessible on all sides to fire and emergency crews. Emergency access to the Project Site and nearby uses would not be significantly disrupted during construction and operational phases. Further, any final plans would be required to comply with City regulations.

Further analysis is needed to determine the potential for the proposed Project to affect emergency access on a temporary basis during construction and after construction and occupancy and significance of any changes.

4.18 Tribal Cultural Resources

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

Potentially Significant Impact: The Project Site has historically been developed and is currently the site of an existing apartment complex. No tribal cultural resources have been previously identified on the Project Site.[29] The proposed Project would require excavation for construction of the subterranean parking level, which may result in disturbance of native soils.

The City has provided formal notification of this proposed Project and the opportunity to consult to Native American tribes pursuant to PRC 21080.3.1(b) and California Government Code Section 65352.

Further analysis is needed, based on consultation with interested Native American tribes, to determine the potential for the proposed Project to affect tribal cultural resources to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (d) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

[29] City of Monrovia General Plan EIR

Potentially Significant Impact: As discussed above, the Project Site is developed with an existing apartment complex and no tribal cultural resources have been previously identified on the site.

The City has provided formal notification of this proposed Project and the opportunity to consult to Native American tribes pursuant to PRC 21080.3.1(b) and California Government Code Section 65352.

Further analysis is needed, based on consultation with interested Native American tribes, to determine the potential for the proposed Project to affect tribal cultural resources to determine if these changes will result in significant impacts.

4.19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Project Mitigation	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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐

Potentially Significant Impact: Development of the proposed Project would increase demand for water service, wastewater conveyance and treatment, electrical service, natural gas service, and telecommunication facilities and may require the relocation or construction of new or expanded facilities.

Further analysis of the potential effect of the proposed Project on existing utility service is needed to determine the significance of any effects to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐

Potentially Significant Impact The City operates its own water utility service system, with all water obtained from five active wells located in the Main San Gabriel Basin with a total capacity of over 10,000 gallons per minute.[30] The proposed Project would replace the existing apartment complex on the Project Site containing 154 units with a new multifamily building containing 269 residential units, which would increase demand on the City's water supplies.

Further analysis of the sufficiency of the City's water supplies to meet the increase in demand that would result from the proposed Project is needed to determine the significance of any effects to determine if these changes will result in significant impacts.

[30] City of Monrovia. Water System. https://www.cityofmonrovia.org/your-government/public-works/water. Accessed June 2023.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐

Potentially Significant Impact: The City operates the sewer collection system in the City and delivers wastewater to main lines leading to the Sanitation Districts of Los Angeles County San Jose Creek Water Reclamation Plant, located in the City of Whittier.[31]

The proposed Project would replace the existing apartment complex on the Project Site containing 154 units with a new multifamily building containing 269 residential units, which would increase the amount of wastewater generated by uses on the Project Site.

Further analysis is needed to verify the San Jose Creek Water Reclamation Plant has sufficient treatment capacity available to accommodate the increase in wastewater that would result from the proposed Project to determine if these changes will result in significant impacts.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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?	☒	☐	☐	☐

Potentially Significant Impact: The City of Monrovia approved a franchise agreement with Athens Services to serve as the exclusive provider of citywide trash and recycling services in June 2016. Solid waste generated within the City is transported to either the Antelope Valley Public Landfill, the Azusa Land Reclamation Co. Landfill, Chiquita Canyon Landfill, the Commerce Refuse-to-Energy Facility, El Sobrante Landfill, Frank R. Bowerman Sanitary Landfill, Lancaster Landfill and Recycling Center, Mid-Valley Sanitary Landfill, Olinda Alpha Sanitary Landfill, San Timoteo Sanitary Landfill and Recycling Center, Simi Valley Landfill – Recycling

[31] City of Monrovia. Sewer System Management Plan. https://www.cityofmonrovia.org/home/showdocument?id=4776. Accessed June 2023.

Center, Southeast Resource and Recovery Center, Sunshine Canyon City/County Landfill, or the Victorville Sanitary Landfill.

The proposed Project would include demolition of the existing apartment complex and related site improvements and construction of a new multifamily residential building on the Project Site. The demolitions debris would require disposal. The proposed Project would result in an increase in the number of residential units on the Project Site, which would result in an increase in solid waste generation. The proposed Project would also be required to demonstrate compliance with the 2021 Green Building Code, which includes design and construction measures that act to reduce construction-related efficiency measures.

Further analysis is needed to determine the amount of solid waste that would be generated by construction and occupancy and use of the proposed multifamily building in relation to applicable standards and the available capacity of landfills to accommodate the solid waste generated by the proposed Project to determine if these changes will result in significant impacts.

	Potentially Significant Impact	**Less than Significant with Project Mitigation**	**Less than Significant Impact**	**No Impact**
Would the Project:				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

Potentially Significant Impact: As described above, the proposed Project would result in an increase in the amount of solid waste in comparison to the existing uses on the Project Site.

Further analysis is needed to determine the consistency of the proposed Project with applicable federal, state, and local management and reduction statutes and regulations related to solid waste to determine if these changes will result in significant impacts.

4.20 Wildfire

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

No Impact: According to the City of Monrovia General Plan Safety Element, the Project Site and surrounding locations are located outside of the City's High Fire Hazard Severity Zones (FHSZs) and Federal Responsibility Areas. FHSZs are areas in which there exist designations that mandate how buildings are to be constructed and subsequently protected such that risks to properties associated with wildland fires are reduced.

The proposed Project would redevelop a site currently developed with residential uses and would not involve changes to public streets around the site. The proposed Project would not alter the roadway system. The proposed Project would not disrupt emergency access roadways. The proposed Project is accessible on all sides to fire and emergency crews. Emergency access to the Project Site and nearby uses would not be disrupted during construction and operational phases. Any final plans would be required to comply with City regulations. Therefore, adopted emergency response plans or emergency evacuation plans would not be substantially impaired.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

No Impact: The Project Site is located in the relatively flat portion of downtown Monrovia and is not located in or near state responsibility areas, nor lands classified as very high fire hazard severity zones.[32] In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.[33] As described above, the Project Site is an urban,

32 Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/ accessed February 2023.
33 City of Monrovia General Plan Safety Element (2022), Page 18.

infill site that is surrounded by commercial and residential uses. There are no wildlands in or directly adjacent to the Project Site. No impacts would occur.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

No Impact: The Project Site is located in a developed portion of the City of Monrovia and redevelopment of the site with a new multifamily residential building would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Only minor and localized relocation or construction of new or expanded facilities of infrastructure located adjacent to the Project Site may be required to accommodate the proposed Project. The proposed Project does not propose or require improvements or maintenance of infrastructure that would exacerbate fire risk.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

No Impact: The Project Site is not located in or near state responsibility areas, nor lands classified as very high fire hazard severity zones.[34] In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.[35] The Project Site and surrounding areas are located on relatively flat portions of the floor of the San Gabriel Valley and is not located downslope or downstream of any hillside areas. No impacts would occur.

34 Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/ accessed February 2023.
35 City of Monrovia General Plan Safety Element (2022), Page 18.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact: As addressed in this Initial Study, the proposed Project does not have the potential for significant impacts to biological resources.

The Project Site is developed with an existing apartment complex. The proposed six story residential building would include one level of subterranean parking; construction of which would require excavation of the site. The required excavation has the potential to disturb native soils, which creates the potential to encounter cultural, tribal, and paleontological resources that may be present in any undisturbed native soils that may be excavated.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐

Potentially Significant Impact: The construction and operation of the proposed Project, in conjunction with other related projects, has the potential to result in cumulative impacts. Additional analysis is needed to determine the significance of any cumulative impacts the proposed Project would contribute to.

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Potentially Significant Impact: The proposed Project would redevelop a site containing an existing apartment complex with a new multifamily residential building. The construction and operation of the proposed Project has the potential to result in direct or indirect adverse effects on human beings.

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